MEMORANDUM

To: Chairman Richard L. Mathias
Commissioner Terry S. Harvill
Commissioner Edward Hurley
Commissioner Richard E. Kolhauser
Commissioner Ruth Kretschmer
Charles Fisher
Myra Karegianes

From: Pat McLarney

Subject: Staff report as directed by Commission Order in Docket 98-0555 Condition 29, Additional OSS, acceptance or rejection SBC/Ameritech's Illinois Plan of Record.

Date: February 7, 2000

After review of the documents and several meetings regarding this topic, Staff recommends that the Illinois Plan of Record (POR) issued by SBC/Ameritech on January 7, 2000, and its follow-up letter dated February 1, 2000, be accepted by the Commission.

Staff plans to brief the Commission during the Open Session on February 15, 2000. A target action date on this item has been set for February 23, 2000. If the Commission is in agreement with this recommendation, Condition 29 would proceed to Phase 2.

In Phase 2 one of two situations may occur depending upon the cooperation of the parties involved. In the best of circumstances Phase 2 will consist of a 90 day collaborative process resulting in a written agreement between all parties. The second scenario would occur if after the first 30 days of the collaborative process there is still disagreement between the parties. The parties would each prepare a list of the unresolved issues in dispute and submit them to the Commission for arbitration.

A Gantt chart detailing the timeline follows this cover page.

Staff also requests that the Commission review and approve the recommended arbitration process that may be needed for Phase II.

Please let me know if you have questions.

Events	Date	January	February	March	April	May
Plan of Record Received	01/07/2000					
CLEC Review Period Ends	01/21/2000					
Staff Drafts Recommendation	02/05/2000					
Staff Recommendation sent to Commission	02/07/2000					
Staff Briefs the Commission	02/15/2000					
Commission Target Approval/Rejection Date	02/23/2000					
Phase 2 - Path I						
Collaborative Discussions						
Written Agreement of OSS Changes						
- OR -						
Phase 2 - Path II						
Collaborative Discussions						
Create List of Unresolved Issues in Dispute						
Arbitration Conducted by Commission						
Written Agreement of OSS Changes						

ILLINOIS COMMERCE COMMISSION
TELECOMMUNICATIONS STAFF REPORT

February 7, 2000

I. Subject

Staff report as directed by Commission Order in Docket 98-0555 Condition 29, Additional OSS, acceptance or rejection SBC/Ameritech's Illinois Plan of Record. Staff additional seeks Commission review and approval of Staff's recommended arbitration process.

II. Recommended Action

After review of the documents and several meetings regarding this topic, Staff recommends that the Illinois Plan of Record (POR) issued by SBC/Ameritech on January 7, 2000, and its follow-up letter dated February 1, 2000, be accepted by the Commission. By this acceptance, Condition 29 will proceed to Phase 2 of this process as follows:

> 'In Phase 2 SBC/Ameritech shall work collaboratively with ICC Staff and Illinois CLECS, in a series of workshops, to obtain written agreement on OSS interfaces, enhancements, and business requirements identified in the Plan of Record.'

Phase 2 will provide the opportunity for CLECs and SBC/Ameritech to informally and efficiently obtain written agreement on OSS interfaces, enhancements and business requirements. It is imperative that these collaborative discussions be used as a forum for education, understanding and continued cooperation by all parties involved. Staff's recommendation should not be construed to indicate that the POR is complete or that there are no issues remaining. Instead, we believe that the POR is a starting point from which the collaborative discussions can begin.

Although Staff's intention is for the collaborative process to result in written agreement between the parties regarding SBC/Ameritech's Future Method of Operation (FMO), Staff acknowledges that the parties may not fully agree on all issues.. As a result, Staff recommends the following seven week process be utilized in the event arbitration is needed to address any unresolved issues:

During the sixth week of Phase 2, the Commission will initiate an expedited hearing process addressing the list of unresolved issues prepared by the parties. After a two week hearing process in front of a hearing examiner in which testimony will be submitted and witnesses cross examined, the hearing examiner will have one week to issue a proposed order. The parties will have one week to provide exceptions to the hearing examiner's proposed order. The Commission will subsequently have three weeks to: (1) consider the merits of the parties' positions; (2) consult the subject matter expert independent third party; and, (3) issue a final arbitration order.

Finally, Staff points out three implications that arise from the aforementioned arbitration scenario envisioned by Staff. First, Staff cannot be a party to the arbitration proceedings while maintaining a working relationship with the independent third party. Second, Staff notes that under the arbitration scenario envisioned by Staff, the third party will be unable to advocate a position

during an arbitration hearing while simultaneously maintaining its advisory role to the Commission. Third, ex parte considerations prevent the independent third party from advising both the hearing examiner and the Commission on the relative merits of the parties' positions.

III. History

The Illinois Commerce Commission approved the merger Order of SBC/Ameritech on September 23, 1999. The merger Order included Condition 29, Additional OSS (Operational Support Systems). Condition 29 states that SBC/Ameritech is responsible for deploying:

> 'application-to-application interfaces as defined, adopted, and periodically updated by industry standard setting bodies for OSS (e.g. Electronic Bonding Interface ("EBI")) that support pre-ordering, ordering, provisioning, maintenance and repair, and billing for resold services, individual UNEs, and combination of UNEs. Deployment of the application-to-application interfaces will be carried out in three phases.
>
> - Phase 1: Within 3 months after the Merger Closing Date or final regulatory approval, Joint Applicants shall complete a publicly available Plan of Record which shall consist of an overall assessment of SBC's and Ameritech's existing OSS interfaces, business processes and rules, hardware and data capabilities, and security provisions, and differences, and the companies' plan for developing and deploying application-to-application interfaces and graphical user interfaces for OSS, as well as integrating their OSS processes. The Plan of Record shall be accepted, or rejected by this Commission after an expedited (two week) CLEC comment cycle.
>
> - Phase 2: SBC/Ameritech shall work collaboratively with ICC Staff and Illinois CLECs, in a series of workshops, to obtain written agreement on OSS interfaces, enhancements, and business requirements identified in the Plan of Record. Phase 2 shall be conducted under the auspices of the ICC and shall be completed in a total of 3 months unless the parties mutually agree to extend Phase 2, or unless the Commission grants a reasonable request for an extension by a participating party. If the CLECs and SBC/Ameritech have not reached agreement after one month of such sessions, the parties shall prepare a list of the unresolved issues in dispute and submit the remaining unresolved issues in dispute to arbitration by the Commission.'

SBC/Ameritech issued their POR on January 7, 2000. A two week CLEC comment cycle followed, ending January 21, 2000. Comments were received from the following six CLECs: AT&T, CoreComm, Covad, MCI WorldCom, Sprint, and Rhythm. AT&T and MCI WorldCom

recommended that the Commission reject SBC/Ameritech's Illinois Plan of Record, primarily due to lack of specificity. They indicated that it did not address what the Commission ordered, particularly the future mode of operation (FMO). The other four CLECs expressed concern but did not recommend that the Commission reject the plan. All six of the CLECs reply comments to the POR are included as Attachments (B1-B6).

On January 28, 2000, Commission Staff met with SBC/Ameritech representatives to discuss the POR and the CLEC reply comments. In this discussion, SBC/Ameritech contended that some POR details needed to be discussed and agreed to during the collaborative process. SBC/Ameritech wants to be sure that by moving to a new standard of a given interface a loss of existing functionality does not occur. SBC/Ameritech also indicated that they did not want to interfere or conflict with discussions already occurring in other CLEC collaboratives (i.e. Advanced Services Forum). As a result of the meeting on January 28, SBC/Ameritech produced a follow-up letter to their POR on February 1, 2000. The letter included the existing regional change management process. It also stated their minimum commitment to standards regarding their ordering interface (i.e. LSOG 4 (EDI 10)). The follow-up letter did not address all of the issues raised by the CLECs in their comments.

On February 1-2, 2000, Staff met separately with AT&T and MCI WorldCom, the two CLECs who recommended rejecting the POR. Their primary concern remains SBC/Ameritech's lack of detailed information in the POR regarding SBC/Ameritech's FMO. These two CLECs want to know specifically what version of the industry standard SBC/Ameritech plans to deploy for pre-ordering and billing. They also want to know what deviations from those standards, if any, SBC/Ameritech plans to make. AT&T and MCI WorldCom believe that until SBC/Ameritech provides additional detail the collaborative process should not begin. They believe this information is imperative to facilitate a meaningful collaborative process.

In further discussion, SBC/Ameritech committed to deploy a minimum of LSOG 4 (EDI 10) for pre-ordering and EDI 811 version 4010 for the billing interface.

While Staff did not speak directly with Sprint, Covad, CoreComm or Rhythm to review their comments, Staff believes their remarks are equally important and can be addressed in Phase 2. Staff notes that none of the other four CLECs recommended rejecting SBC/Ameritech's POR.

The following chart provides a timetable of important events related to this topic:

Key Date	**Historical Event**
September 23, 1999	SBC/Ameritech merger closing date
January 7, 2000	SBC/Ameritech IL Plan of Record (POR) issued
January 21, 2000	CLEC POR review period ends (Responses Received from MCI WorldCom, AT&T, Sprint, Covad, CoreComm and Rhythm)

January 28, 2000	Staff meet with SBC/Ameritech representatives to discuss POR and CLEC Comments to the POR
February 1, 2000	SBC/Ameritech issues follow-up letter to its POR
February 1, 2000	Staff meet with MCI WorldCom to discuss POR
February 2, 2000	Staff meet with AT&T to discuss POR
February 4, 2000	Staff submits POR recommendation to the Commission for review

IV. CLEC Comments

Comments from the CLEC community were fairly similar. They centered around five main areas (1) change management, (2) loops and advanced services, (3) lack of industry standards, (4) OSS integration and (5) specific provisions. Following are some excerpts from the CLEC reply documents regarding these areas and Staff's position.

(1) Change Management

CoreComm spoke to the change management process in their reply. 'SBC/Ameritech should affirmatively identify where the change management process will be addressed.' AT&T stated that 'The Plan of Record does not address the overall change management topic. It does not even indicate whether SBC intends to institute a common Change Management Process or whether it intends to maintain a separate process for Illinois.'

Staff agrees that the POR did not address the change management topic at all. However, in their follow-up letter dated February 1, 2000, SBC/Ameritech discusses both the regional change management process (CMP) which has been in place since June 1999 as well as the 13-state CMP currently being address in a separate CLEC collaborative effort (expected to be approved in March). Staff believes that these processes need to be explained in detail during the OSS collaboratives and SBC/Ameritech needs to indicate how the OSS modifications will be incorporated into the existing and/or 13 state change management process.

(2) Loops and Advanced Services

MCI WorldCom stated 'Ameritech's Illinois POR simply says that DSL qualification functionality will be accomplished as described in the xDSL POR that Ameritech filed with the FCC on December, 7, 1999….its xDSL POR is deficient because it is overly vague and lacks any clear commitments'.

Many of the CLECs who replied believe that the xDSL POR is deficient of pertinent details. Staff believes that the xDSL POR should serve as a starting point for the collaborative process. Staff agrees that xDSL processing should be included in the OSS collaboratives and should build upon the work already completed in the advanced services collaboratives.

(3) Lack of Industry Standards

Covad Communications stated 'the Future Method of Operation makes no attempt to align Ameritech Illinois' OSS interfaces with industry standards as defined by the Order and Billing Forum (OBF) and the Telecommunications Industry Forum (TCIF).' Almost every other CLEC also had similar comments.

SBC/Ameritech has committed to Staff to deploy LSOG 4 (EDI 10) for pre-ordering and ordering, as well as, EDI 811 version 4010 for billing.

(4) OSS Integration

AT&T stated in their reply document to the POR that 'Consistent with Condition 29, the Plan should describe how the OSS interfaces will be made uniform, how and when the integration will take place and whether any of the interfaces will gain or lose characteristics or functions as a result of integration.'

Staff believes that the merger requirements did not stipulate uniformity. The road to complete OSS integration will be a long and complex one that will not be completed in the timeframe of merger implementation. For now Staff is looking for movement toward industry standards and increased functionality in the competitive marketplace. Continued cooperation on the part of SBC/Ameritech and CLECs to work together to move that process forward is required.

(5) Specific Provisions

Throughout the reply documents specific provisions were listed that CLECs felt were not discussed in sufficient detail in the POR. A subset of these are as follows: line sharing, pending order status inquiry, PONS versioning, 836, 860, 865 transaction processing, electronic jeopardy notification, directory listings, fielded completion notices, MLT (mechanized loop testing), WTN (working telephone number) verification, DSL loop pre-qualification & qualification inquiry, dispatch inquiry, maintenance and repair GUI (graphical user interface) modifications, pre-ordering GUI specifications.

Staff believes these items can and should be addressed in detail during the collaborative process.

Staff shares the concern of the CLECs on many of the issues raised during the reply period. Staff, however, does not believe there is a benefit in stopping or holding up a process whose end result should allow for a more fair playing field in today's competitive local environment. Staff believes that many of the issues raised will be resolved in the collaborative process. Those issues not resolved collaboratively, if any, will go to arbitration as contemplated by Condition 29.

V. Summary

Staff recommends that the Illinois Plan of Record (POR) issued by SBC/Ameritech on January 7, 2000, and its follow-up letter dated February 1, 2000, be accepted by the Commission. Staff concurs with the CLECs that the POR does not contain all potential OSS future method of operation (FMO) details. Staff, however, believes the process should not be stopped when all parties involved will benefit from the continuation of open discussions via the collaborative process. At the conclusion of the collaborative/arbitration process of Phase 2, SBC/Ameritech will have a written agreement detailing planned changes to be implemented in Phase 3.

Staff also requests that the Commission approve the recommended arbitration process described in Section II, Recommended Action.

VI. Attachments

SBC/Ameritech Documents

A-1 SBC/Ameritech Illinois Plan of Record
A-2 SBC/Ameritech Illinois Plan of Record Follow-up Letter

CLEC Documents

B-1 AT&T Reply to SBC/Ameritech Illinois Plan of Record
B-2 MCI WorldCom Reply to SBC/Ameritech Illinois Plan of Record
B-3 Sprint Reply to SBC/Ameritech Illinois Plan of Record
B-4 Covad Reply to SBC/Ameritech Illinois Plan of Record
B-5 CoreComm Reply to SBC/Ameritech Illinois Plan of Record
B-6 Rhythm Reply to SBC/Ameritech Illinois Plan of Record

Attachment A-1

SBC/Ameritech Illinois Plan of Record

Ameritech Illinois Plan of Record

I. OVERVIEW

A. Introduction

SBC's four regions: Ameritech, Pacific Bell/Nevada Bell(PB/NB), Southwestern Bell Telephone (SWBT) and Southern New England Telephone (SNET) currently make available a wide variety of Operational Support Systems (OSS) and interfaces to CLECs. For example, Ameritech Illinois' existing OSS interfaces for pre-ordering, ordering, provisioning, maintenance and repair, and billing have been in use since 1996 and are being used by a wide variety of CLECs to a significant extent.

This Plan of Record (POR) is the initial step of a three-phase process to achieve OSS system integration in a manner consistent with the conditions of the Illinois Commerce Commission (ICC) approval of the SBC/Ameritech merger.

Each of SBC's regions have most of the same functions and data elements, however, there are differences from region to region. To mitigate the complexity caused by this lack of OSS uniformity, SBC/Ameritech offered a number of OSS commitments designed (a) to create a comprehensive plan of integration for the Ameritech and SBC OSS processes; (b) to subject that plan to a collaborative process that will incorporate CLEC input into how OSS is made available; and (c) to make the SBC/Ameritech OSS process available on a integrated basis throughout the post-merger SBC/Ameritech states. This document is designed to provide a comprehensive analysis and plan for a specific process for integrating these OSS systems and to ensure that this integration process will not have an adverse impact on competition in Illinois.

This plan is separate and distinct from the upcoming POR being issued in response to the Federal Communications Commission (FCC) requirements pertaining to uniform and enhanced OSS as set forth in the SBC/Ameritech merger conditions approved in the Memorandum of Understanding and Order, released on October 8, 1999 (SBC/Ameritech Merger Conditions). However, this Plan is consistent with all state and federal conditions and stipulations governing the SBC/Ameritech merger as related to OSS interfaces.

Deliverables outlined in the OSS POR for Pre-ordering and Ordering of xDSL and Other Advanced Services filed previously at the FCC, and are specific to Ameritech Illinois, will be detailed in this plan. Future and on-going Competitive Local Exchange Carrier (CLEC) collaborative efforts, such as xDSL workshops, could impact the specific deliverables and timeline of this plan.

B. Scope

The focus of this POR defines a plan for Ameritech Illinois to make available modified OSS, in accordance with the schedule and commitments outlined in the ICC conditions for the SBC/Ameritech merger. These OSS include commercially ready, application to application interfaces and graphical user interfaces (GUIs) which support pre-ordering, ordering, provisioning, maintenance and repair and billing for resold services, individual Unbundled

Network Elements (UNEs), and combinations of UNEs. While most of these interfaces are existing and currently in use, some additional GUI access to these OSS functions will be provided as a result as this plan.

The commitment to provide direct access to SBC's SORD, or the equivalent service order processing system in the SNET and Ameritech states, as specified in ¶28 of the ICC SBC/Ameritech Merger Conditions, is based on an actual CLEC request specifying the functionality desired. An assessment of this area will be not be addressed in this document, but will be made following an actual CLEC request defining the scope of these projects.

This plan will detail the Present Method of Operation (PMO) for pre-ordering, ordering, provisioning, maintenance and repair, and billing across all four regions of SBC. The Future Method of Operation (FMO) will identify the changes and milestones associated with the OSS processes and interfaces available to CLECs doing business with Ameritech Illinois.

C. Process Methodology

This POR follows the framework established by the SBC/Ameritech Pre-Merger "OSS Process Improvement Plan" and contains an analysis of the current operating environment, identified differences within the SBC operating regions, conclusions regarding the operating environment in Ameritech Illinois and a deployment plan for the changes necessary to achieve the future environment.

The following steps were taken to create this plan:

- Subject matter experts were assembled from various OSS business requirement areas and from Information Technology system and architecture areas.
- The PMO was documented for pre-ordering, ordering, provisioning, maintenance and repair and billing processes and interfaces.
- The FMO interfaces and processes for pre-ordering, ordering, provisioning, maintenance and repair, and billing were identified and documented.
- An FMO implementation plan documenting the appropriate process and interface changes and associated timelines was documented.

The criteria for determining the future method of operation included, but was not limited to:

- Business requirements, including the number of actual current users, the volumes currently processed, the flow-through capability that already exists as well as the expected number of users and requests (i.e., future capacity requirements).

- Industry standards or guidelines, such as those published by T1, the Ordering and Billing Forum (OBF) and Telecommunications Industry Forum (TCIF).

- Downstream impacts of any changes, such as the effect that changes in the applications would have on methods and procedures.

- CLEC input, including the types of change requests CLECs are initiating, the discussions in change management meetings regarding developmental plans, CLEC specific feedback from the account teams, other OSS support personnel, training classes and CLEC forums.

- The architecture of Ameritech Illinois' current OSS, including available data and functionality.

- The current security methods including firewalls, addresses, passwords, and where and how CLECs gain access.

SBC will follow the three-phase process identified in the ICC conditions for the SBC/Ameritech merger. Once this POR is filed, SBC will work collaboratively with CLECs and the ICC Staff to obtain written agreement on OSS interfaces, enhancements and business requirements identified in this POR and ultimately develop and deploy those agreed upon changes.

II. PRESENT METHODS OF OPERATION (PMO)

There are similarities between the pre-ordering, ordering, provisioning, maintenance and repair, and billing functions offered by each SBC region. The following analyses detail the functional business processes and interfaces, specifically comparing Ameritech Illinois with Pacific Bell/Nevada Bell (PB/NB), Southwestern Bell Telephone (SWBT) and Southern New England Telephone (SNET).

There are differences in central issues to each functional area, e.g. standard data elements for maintenance, and functional alignment to standards for pre-ordering. These differences will be described for each functional area.

A. Pre-ordering

Available Interfaces

The Southwestern Bell Telephone (SWBT), Pacific Bell/Nevada Bell (PB/NB), Ameritech and Southern New England Telephone (SNET) regions provide CLECs with application to application access to pre-ordering functions via electronic data interchange (EDI), which has been selected by the Ordering and Billing Forum (OBF) as one of the methods for exchanging information between telecommunications companies regarding orders for local service. Common Object Request Broker Architecture (CORBA) is a second interface used by SWBT and PB/NB to provide application to application pre-ordering functions.

SWBT and PB/NB have implemented EDI pre-ordering functions based on the Ordering and Billing Forum (OBF) Local Service Ordering Guidelines (LSOG) version 4, Telecommunications Industry Forum (TCIF) Electronic Data Interchange Local Mechanization Specification (ELMS) issue 4, and EDI ASC X12 version 4010. Ameritech and SNET EDI pre-ordering interfaces were implemented prior to acceptance of industry guidelines, and utilize ASC X12 version 3072.

SWBT and PB/NB have implemented CORBA pre-ordering functions based on the OBF LSOG version 4, ANSI T1.265-1999. SNET has not made a CORBA-based pre-ordering interface available to CLECs.

Ameritech Illinois has made the EDI pre-ordering interface available for local service pre-ordering and does not currently support a CORBA-based pre-ordering interface.

In addition to the application to application interface using EDI/CORBA, the SWBT and PB/NB regions also provide pre-ordering functions via DataGate. DataGate is a proprietary application to application interface implemented prior to the acceptance of industry guidelines.

Graphical User Interface (GUI) access to pre-ordering functions is provided to CLECs in the SWBT and PB/NB regions via the Verigate application. SNET provides GUI access to pre-ordering functions via W-CIWin.

Ameritech Illinois provides GUI access to pre-ordering functionality via TCNet.

The following table summarizes the pre-ordering interfaces currently available in the SBC operating regions.

Pre-Ordering	SWBT	PB/NB	SNET	Ameritech
Industry App to App Gateway				
Application Name	EDI/CORBA	EDI/CORBA	MSAP	EDI
LSOG Version	4	4	NA	NA
Protocol / Version	EDI 9 / 4010	EDI 9 / 4010	EDI / 3072	EDI / 3072
Protocol / Version	CORBA / T1.265-1999	CORBA /T1.265-1999		
Proprietary App to App Gateway				
Application Name	DataGate	DataGate		
Proprietary GUIs				
Application Name	Verigate	Verigate	W-CIWin	TCNet

EDI Message Flows

The current application to application interfaces utilize ASC X12 transaction sets to pass EDI access information between requestor (CLEC) and provider (SWBT, PB/NB, Ameritech or SNET).

The SWBT, PB/NB and SNET regions utilize the 850, 855, and 997 transaction sets. A typical pre-ordering transaction begins when a CLEC submits an 850 transaction. When the 850 is received, a 997 transaction is immediately returned to the CLEC to communicate the receipt of the request. Responses, whether positive or negative, are returned to the CLEC via an 855 transaction. The CLEC may return a 997 transaction to communicate the receipt or rejection of the 855.

Ameritech Illinois utilizes the 850, 855, and 864 transaction sets. A typical pre-ordering transaction begins with the receipt of an 850 transaction from a CLEC. A 997 transaction is not used to communicate receipt of the 850. Responses, whether positive or negative, are returned to the CLEC via an 855 transaction or an 864 transaction. The

864 transaction is used to return Customer Service Information (CSI) to the CLEC. Ameritech Illinois does not require a CLEC to return a 997 transaction.

Functions

Pre-ordering functions allow for the exchange of certain information between Ameritech Illinois and CLECs for the purposes of submitting accurate requests for local service. This exchange of information is performed based on an inquiry and response process. The following pre-ordering functions are each used in one or more SBC regions.

Address Validation Inquiry

This function is used to verify an end user address provided by the requesting CLEC, and is performed to ensure subsequent local service requests contain a valid address.

This function is available in the SWBT and PB/NB regions via the EDI/CORBA, DataGate and Verigate interfaces. Similarly, address validation is performed in the SNET region via the application to application interface and W-CIWin. In the SWBT and PB/NB regions, working telephone number (WTN) may also be used to retrieve a valid residential service address. In addition to the address validation information, supplemental information is returned in each operating region such as tax area codes and the primary NXX of the local service office. This information varies by operating region because it does not equally reside in the regional backend OSS that is performing the address validation function.

Ameritech Illinois provides this function via the application to application interface and TCNet.

Common Language Location Indicator (CLLI) Inquiry

This function provides the CLLI code associated with a telephone number, and is used to determine the appropriate CLLI submitted on a local service request for port or loop with port service.

This function is available in the SWBT region via the DataGate and Verigate interfaces. In the PB/NB region, this same information is provided with the information provided via the Feature/Service Availability function via DataGate and Verigate. This function is not supported in the SNET region.

This function is not supported in Ameritech Illinois. CLLI information is provide by Ameritech Illinois to CLECs manually.

Connecting Facility Assignment (CFA) Inquiry

This function retrieves a list of channel assignments, design-related information and work authorization information for leased DS1 and DS3 facilities. This inquiry provides data used to verify the status of a connecting facility prior to submitting this information on a local service request.

In the SWBT and PB/NB regions, this function is available via the DataGate and Verigate interfaces. This transaction is not supported in the SNET region.

This transaction is not supported in Ameritech Illinois, and no request has been made of Ameritech Illinois to provide this capability.

Customer Service Information Inquiry

This function retrieves current end user service records. The information provided on the CSI is used to verify existing features and services prior to the submission of a local service request.

In the SWBT and PB/NB regions, the Customer Service Information function allows for retrieval of records by either account telephone number (ATN) or individual working telephone number, and is available via the EDI/CORBA, DataGate and Verigate interfaces. In the SNET region, this function only supports retrieval using account telephone number via the application to application interface and W-CIWin.

In SWBT region, responses are provided for accounts of up to 5,000 working lines on the application to application interfaces, and for up to 1000 working lines on the GUI. PB/NB provides responses for accounts containing up to 4 megabytes of data, and SNET up to 128 kilobytes of data. Requests for customer service records exceeding these parameters must be submitted to the local service centers for fulfillment.

In the SWBT, PB/NB, and SNET regions, CLECs may retrieve Resale CSI when the end user account is owned by another CLEC.

In Ameritech Illinois, this inquiry may also be performed by either account or working telephone number, and is available through the application to application interface and TCNet. In Ameritech Illinois, responses are provided for accounts up to 20,000 display lines. Requests for customer service records exceeding these parameters must be submitted to the local service centers for fulfillment. Ameritech Illinois does not permit CLECs to view CSI when it is owned by another CLEC.

Data Validation Files

The exchange of information from some of the functionality listed is based on relatively static data. As a result, Data Validation Files are available for the purpose of providing requesting CLECs with an alternate method of acquiring pre-ordering information.

Street Address Guide, PIC/LPIC Codes and Feature/Service availability information is available via File Transfer Protocol (FTP) in the SWBT and PB/NB regions. Access to PIC/LPIC codes and product availability files can also be arranged via Connect:Direct. SNET provides a file containing valid directory yellow page headings downloaded from the CLEC web site.

In Ameritech Illinois, files containing directory names, class of service codes, USOC, community names, yellow page headings, feature/service availability, street address guides, and PIC/LPIC codes are available via Connect:Direct, CD-ROM and TCNet.

Digital Subscriber Loop Pre-qualification Inquiry

This function provides an indication of theoretical loop length and indication of local serving office locations where SBC has deployed ADSL.

In the SWBT and PB/NB regions, this function is available via the DataGate and Verigate interfaces. Also provided in the SWBT region is theoretical 26-gauge loop length and taper code information. This function is not available in the SNET region.

This function is not available in Ameritech Illinois.

Digital Subscriber Loop Qualification Inquiry
This function provides specific, detailed loop make-up information for a loop to a specific address and provides information necessary to determine the suitability of that loop for xDSL services.

In all SBC regions, including in Ameritech Illinois, loop qualification is a manual process using fax and/or E-mail.

Directory Listing Inquiry
This function is used to retrieve directory listing information associated with an end user telephone account.

This function is available in the SWBT region via the EDI/CORBA application to application interface. The SNET region also provides this function via the application to application interface and W-CIWin. This information is available as part of the Customer Service Information function via the EDI/CORBA application to application interface in the PB/NB region.

In Ameritech Illinois, directory listings are available as part of the Customer Service Information function via the application to application interface and TCNet.

Dispatch Inquiry
This function indicates when the dispatch of a SBC technician is required for residential service ordered on a local service request. Dispatch is based on the existence of cut-through facilities and assists the CLEC in determining the due date that may be quoted to the end user.

This function in the SWBT and PB/NB regions is available via the EDI/CORBA, DataGate and Verigate interfaces. In the SNET region, this information is provided as part of the Address Validation function.

In Ameritech Illinois, this information is provided as part of the Due Date function.

Due Date Inquiry
This function allows for the identification of available premise visit dates for services to be ordered on a local service request.

In the SWBT and PB/NB regions, this inquiry is available via the EDI/CORBA, DataGate and Verigate interfaces. In the SNET region, the inquiry function is available via the EDI interface and W-CIWin.

All regions return the next available due date. In addition to that date, twenty-seven alternate dates are returned in the SWBT region, and four alternate dates are returned in the SNET region. No alternate dates are returned in the PB/NB region. In the SNET region, a standard interval appropriate to basic local service is returned for non-dispatch orders.

In Ameritech Illinois, inquiry, reservation, confirmation and cancellation functions are supported via the application to application interface. In addition to the next available due date, twenty-nine alternate dates are returned by Ameritech

Illinois. In Ameritech Illinois, a non-dispatch, dispatch, or standard interval due date is returned based on available facilities, and customer order parameters.

Feature/Service Availability Inquiry
This function provides for the availability of specific features and services at a particular local serving office switch.

This function in the SWBT and PB/NB regions is available via the EDI/CORBA, DataGate and Verigate interfaces. The SWBT and PB/NB EDI/CORBA interfaces validate the availability of a single feature or service per transaction using the feature/service in USOC format as input. Inquiries via the DataGate and Verigate interfaces return a list of available features/service USOCs retrieved by ten-digit telephone number in the SWBT region. A list of USOCs and associated SOSC codes are retrieved using CLLI or NPA-NXX in the PB/NB region. In the SNET region, a list of available features in terms of SOSC codes is provided via the application to application interface and W-CIWin.

In Ameritech Illinois, this information is provided from a Data Validation file in USOC format, and is available via TCNet.

Network Channel/Network Channel Interface (NC/NCI) Inquiry
This function provides for the validation of Network Channel (NC) and Network Channel Interface (NCI) codes and their combinations prior to submitting a local service request.

In the SWBT and PB/NB regions, this function is available via the DataGate and Verigate interfaces. SNET does not currently support this function.

Ameritech Illinois does not currently support this function. Information regarding valid NC/NCI codes is provided via CLEC ordering documentation on TCNet.

Pending Order Status Inquiry
This function provides access to pending service order status and content prior to the conversion of an end-user account.

Utilizing the DataGate interface in the SWBT region, access to a list of pending service orders is provided by working telephone number. Detailed service order information is provided when an inquiry containing working telephone number and service order number is processed. This functionality is also available in the GUI interface called Order Status for both the SWBT and PB/NB regions. In that GUI, additional search criteria utilizing customer number and purchase order number are available to process a list of pending service orders and detailed service order information. SNET does not currently support this function.

Ameritech Illinois does not currently support this function.

PIC/LPIC Inquiry
This function provides a list of current Primary Interexchange Carrier (PIC) and Local Primary Interexchange Carrier (LPIC) codes for carriers providing service at a particular local serving office switch.

A list of PIC/LPIC codes is retrieved by ten-digit telephone number via the EDI/CORBA, DataGate and Verigate interfaces in the SWBT region. A list is available by CLLI or NPA/NXX in the PB/NB region. SNET does not currently provide this function.

In Ameritech Illinois, list of PIC/LPIC codes are available using NPA/NXX through the application to application interface and via TCNet. Additionally, this information is available as part of the Data Validation Files.

Telephone Number Availability

These functions allow available telephone numbers to be identified and held for use by a CLEC submitting a local service request:

- Inquiry - Provides a list of available telephone numbers for a given local serving office switch.
- Inquiry/Selection - Provides and holds a list of available telephone numbers for a given local serving office switch.
- Reservation - Allows available telephone numbers to be held until either the receipt of a valid local service request, cancellation of reservation/selection, or the end of a specified holding period.
- Confirmation - Confirms previously reserved or held telephone numbers.
- Cancellation - Allows the release of telephone numbers previously reserved or held.

This function is available in the EDI/CORBA, DataGate and Verigate interfaces in the SWBT region and supports inquiry/selection and cancellation. This function is available in the same interfaces in the PB/NB region and supports inquiry, reservation and cancellation. Via the application to application interface and W-CIWin in the SNET region, this function supports inquiry/selection, and cancellation.

This function is available in Ameritech Illinois via the application to application interface and supports inquiry, reservation, confirmation and cancellation.

The following table summarizes functionality currently available in each of the SBC regions. Each row represents a function offered in at least one region. Unless otherwise noted, the Interface or GUI access options available by region are shown in the heading.

Function	**Existing Functionality and Interface(s) by Region**			
	SWBT **EDI/CORBA, DataGate, and Verigate**	**PB/NB** **EDI/CORBA, DataGate, and Verigate**	**SNET** **EDI and W-CIWin**	**Ameritech** **EDI and TCNet**
Address Validation	Numbered, Unnumbered, Unnamed, Descriptive inquiry	Numbered, Unnumbered, Unnamed, Descriptive inquiry	Numbered, Unnumbered, Unnamed, Descriptive inquiry	Numbered, Unnumbered, Unnamed, Descriptive inquiry
	WTN inquiry	WTN inquiry	---	---
Common Language Location Identifier (CLLI)	CLLI inquiry DataGate and Verigate	Information included as part of Feature/Service Availablity	---	---
Connecting Facility Assignment (CFA)	CFA inquiry DataGate and Verigate	CFA inquiry DataGate and Verigate	---	---
Customer Service Information (CSI)	ATN inquiry	ATN inquiry	ATN inquiry	ATN inquiry
	WTN inquiry	WTN inquiry	---	WTN inquiry

Function	Existing Functionality and Interface(s) by Region			
	SWBT **EDI/CORBA, DataGate, and Verigate**	**PB/NB** **EDI/CORBA, DataGate, and Verigate**	**SNET** **EDI and W-ClWin**	**Ameritech** **EDI and TCNet**
Data Validation Files	SAG, PIC/LPIC, Features/Services	SAG, PIC/LPIC, Features/Services	Yellow Page Headings	SAG, PIC/LPIC, Features/Services, Yellow Page Headings, USOCs
	FTP, Direct:Connect, CLEC Web site	FTP, Direct:Connect, CLEC Web site	CLEC Web site	Direct:Connect, CD-ROM, CLEC Online Web site
DSL Loop Pre-qualification	Pre-qualification inquiry DataGate and Verigate	Pre-qualification inquiry DataGate and Verigate	---	---
DSL Loop Qualification	---	---	---	---
Directory Listing	ATN inquiry	Information included as part of CSI	ATN inquiry	Information included as part of CSI
	WTN inquiry	---	---	---
	EDI/CORBA			
Dispatch	Dispatch inquiry	Dispatch inquiry	Dispatch information included in Address Validation inquiry	Dispatch information included in Due Date inquiry
Due Date	Inquiry Next available due date and 27 alternate dates available Resale and Loop w/ Port	Inquiry Next available due date only Resale and Loop w/ Port	Inquiry Next available due date and 4 alternate dates available Non-dispatch, dispatch or standard interval	Inquiry Next available due date and 29 alternate dates available Non-dispatch, dispatch or standard interval EDI only
	---	---	---	Reservation
	---	---	---	Confirmation
	---	---	---	Cancellation
Feature/Service Availability	Validation by individual Feature/Service EDI/CORBA List of Features/Services via DataGate and Verigate USOCs	Validation by individual Feature/Service EDI/CORBA List of Features/Services via DataGate and Verigate USOCs and SOSCs	List of Features/Services SOSCs	--- Features/Services via Data Validation File and TCNet USOCs
NC/NCI Validation	Validation inquiry DataGate and Verigate	Validation inquiry DataGate and Verigate	---	---
Pending Order Status	Pending inquiry DataGate and Order Status	Pending inquiry Order Status	---	---
PIC/LPIC List	Code inquiry	Code inquiry	---	Code inquiry
TN Inquiry	Inquiry/Selection 5 TNs	Inquiry 5 TNs	Inquiry/Selection 4 TNs	Inquiry 10 TNs EDI only

Function	Existing Functionality and Interface(s) by Region			
	SWBT **EDI/CORBA, DataGate, and Verigate**	**PB/NB** **EDI/CORBA, DataGate, and Verigate**	**SNET** **EDI and W-ClWin**	**Ameritech** **EDI and TCNet**
	---	Reservation 5 TNs	---	Reservation 1 TN
	---	---	---	Confirmation
	Cancellation	Cancellation	Cancellation	Cancellation

B. Ordering

Available Interfaces

Application to application access to Local Service Request (LSR)-based ordering functions is provided to CLECs in all SBC regions via an EDI interface, which is the industry standard means of communication for the ordering of local services. The application to application interfaces in all SBC regions currently run ASC-X12, Version 3072. SWBT, PB/NB and SNET have implemented LSOG Version 3, TCIF issue 8, whereas, Ameritech Illinois is currently on LSOG Version 2, TCIF issue 7.

EXACT is the Access Service Request (ASR)-based industry application to application interface utilized in the SWBT, Ameritech and SNET regions for ordering Unbundled Dedicated Transport (UDT) and Interconnection Trunks. Customer's Enhanced System for Access Requests (CESAR) is the ASR-based industry application to application interface utilized for the same purpose in PB/NB. Ameritech Illinois also allows the use of EXACT to order Loops. All regions are currently on ASOG Version 21.

The LSR Exchange (LEX) system is a GUI available to CLECs for ordering LSR-based services in the SWBT and PB/NB regions. SNET and Ameritech do not offer a GUI for LSR-based ordering.

Telis, an ASR-based GUI, is utilized in the SWBT, Ameritech and SNET regions for ordering UDT and Interconnection Trunks. Ameritech also allows the use of Telis for ordering Loops. PB/NB provides CESAR/online as an ASR-based GUI, for ordering UDT and Interconnection Trunks and also provides the GUI Customer's Enhanced System for Access Requests – Interconnection Service Requests (CESAR-ISR), for ordering Loops, Number Portability, and Loop with Number Portability.

Companies may be on the same version/ level of a given guideline, but the implementation may be different. Companies may have implemented some functions or products in advance of standards.

The following table summarizes the ordering application to application interfaces currently available in the SBC operating regions.

ORDERING	SWBT	PB/NB	SNET	Ameritech
Industry Applications	EDI	EDI	EDI (MSAP)	EDI
LSOG Version	3	3	3	2
TCIF Issue	8	8	8	7
X12 Version	3072	3072	3072	3072
ASR	EXACT	CESAR	EXACT	EXACT
ASOG VER.	21	21	21	21

The following table summarizes the ordering GUI interfaces available in the SBC operating regions.

GUIs	SWBT	PB/NB	SNET	Ameritech
LEX	X	X	-	-
LSOG VER.	3	3	-	-
CESAR ISR	-	X	-	-
ASOG VER.	-	21	-	-
TELIS	X	-	X	X
ASOG VER.	21	-	21	21
CESAR Online	-	X	-	-
LSOG VER.	-	NA	-	-

Ordering Message Flows

All SBC regions utilize the standard 997, 850, 855, 860 and 865 transaction sets for the various functions associated with the EDI ordering of Local Services. Ameritech Illinois also uses the 836 transaction. The following describes the current environment and the differences between the regions.

997 Transaction

All regions currently return a 997 transaction to the CLEC to acknowledge the receipt of a data transmission.

850/855 Transactions

A typical ordering transaction begins with a CLEC sending an 850 transaction. Positive or negative responses are returned to the CLEC via an 855 transaction to communicate the disposition of the request. If the request is error free, a positive response is sent in the form of a Firm Order Confirmation (FOC). If errors are detected, a negative response is sent in the form of error information detail. This process is the same in all regions.

In SWBT and PB/NB, two types of errors, fatal or super fatal, may be encountered in a negative 855 transaction. Fatal errors are the most common and these are corrected by the CLEC sending an 860 transaction. Super fatal errors are such that the request could not be processed due to key fields being invalid or missing. These are corrected by the CLEC by sending another 850 transaction. In SNET, when a negative response is received, regardless of the error type, the request is not processed and corrected 850 transactions are sent by the CLEC until the CLEC receives a positive 855 transaction.

In Ameritech Illinois, when a negative response is received regardless of any error type, the request is not processed and another 850 transaction is sent until the CLEC receives a positive 855 transaction. Additionally in Ameritech Illinois, a Purchase Order Advice is sent via an 855 transaction to acknowledge receipt of a request for Number Portability when more than 50 lines are included.

860/865 Transactions

The 860 transaction is used in all regions for a CLEC to submit a change (supplement) to a request. SWBT, PB/NB and SNET require a "full refresh" of the request, meaning that all previous and changed information is included in the supplement.

In Ameritech Illinois, only changed information is submitted on the 860 transaction.

Positive or negative responses are returned to the CLEC via an 865 transaction to communicate the receipt and acceptance or rejection of the supplement (860). Again if the request is error free, a positive response is sent in the form of an FOC. If errors are detected, a negative response is sent in the form of error information detail. To correct errors on an 860 transaction, another 860 transaction is sent. This is the same in all regions.

In SWBT and PB/NB, the 860 transaction could also be a response by the CLEC to a negative 855 transaction due to errors on the original request (850).

In Ameritech Illinois, the 865 transaction is also used to notify CLECs of customer impacting provider initiated changes. Additionally a Purchase Order Advice is sent via an 865 transaction to acknowledge receipt of a supplement for a change to a request for Number Portability when more than 50 lines are included.

836 Transaction

Currently, Ameritech is the only region utilizing the 836 transaction for Loss Notification.

The following table provides a summary of the EDI transaction usage on the ordering application to application interfaces in the SBC operating regions.

RECORD TYPE	SWBT	PB/NB	SNET	Ameritech
997	Acknowledgment	Acknowledgment	Acknowledgment	Acknowledgment
850	Initial Request	Initial Request	Initial Request	Initial Request
855	• FOC • Error Notice	• FOC • Error Notice	• FOC • Error Notice	• FOC • Error Notice • Purchase Order Advice
860	Supplements: • Initiate Change • Correct Errors on 850 record type • Correct Errors on 860 record type • Full refresh	Supplements: • Initiate Change • Correct Errors on 850 record type • Correct Errors on 860 record type • Full refresh	Supplements: • Initiate Change • Correct Errors on 860 record type • Full refresh on most products	Supplements: • Initiate Change • Changes only on supplement • Correct Errors on 860 record type
865	• FOC • Error Notice	• FOC • Error Notice	• FOC • Error Notice	• FOC • Error Notice • Customer impacting - provider initiated changes • Purchase Order Advice
836	NA – Handled via CARE process	NA – Handled via CARE process	• NA – Handled via CARE process	• Loss Notification

C. Provisioning

Provisioning functions, i.e. those functions used to manage and monitor an order during the period between the order placement and order completion, are provided by various processes in the operating regions that allow a CLEC to keep track of the status of an order. These processes are described below.

Certain provisioning functions are provided via the pre-ordering and ordering interfaces. Those functions that are based on an inquiry/response model, e.g. a CLEC asking for and receiving status on a pending order, are accessed using the pre-ordering interface. Order statuses, such as order completion, are proactively sent to the CLEC as the order is processed. These statuses are provided via the ordering interface.

Functions

Following are the provisioning functions available in the SBC operating regions.

Jeopardy Notification

Jeopardy Notification is used when alerting the CLEC that a situation has been encountered in the provisioning of an order that will potentially cause the confirmed due date to be missed.

These notifications are provided via the transaction message flows in the ordering application to application interfaces in the SWBT and PB/NB regions using the 865 transaction. This same notification is provided via the LEX GUI interface. The SNET region provides this notification via a manual process.

Jeopardy notification is currently provided in Ameritech Illinois via the ordering application to application interface using the 870 transaction.

Service Order Completion

Service Order Completion (SOC) is a notification to the CLEC that the work requested on a previously provided purchase order (or request) has been completed.

The SWBT, PB/NB and SNET regions all use the 865 transaction to return a SOC notification via the ordering application to application interface. This notification is also available via the ordering GUI application.

Service Order Completion notification is currently provided in Ameritech Illinois via the ordering application to application interface using the 865 transaction.

Pending Order Status

This inquiry provides access to a list of pending service orders, and their status and content prior to the conversion of an end-user account, for pre-ordering purposes, and prior to the service order posting in the billing system for monitoring order progress.

Utilizing the DataGate interface in the SWBT region, access to a list of pending service orders is provided by working telephone number. Detailed service order information is provided when an inquiry containing working telephone number and service order number is processed. This function is also available in a GUI named Order Status in both the SWBT and PB/NB regions. In this GUI, additional search criteria utilizing customer number and purchase order number are available to access a list of pending service orders and detailed service order information. SNET does not presently support this function.

This function is not currently available in Ameritech Illinois. CLECs may monitor the progress of their orders using an Interactive Voice Response (IVR) system made available by Ameritech Illinois.

Posted Order Status

This inquiry provides access to posted service order status and content. The information provided represents completed service order status as posted to the billing system.

Access to this information is available in the Order Status GUI for the SWBT region. A list of posted service orders or detailed service order information is provided when an inquiry containing customer number is processed. Detailed service order information is provided when an inquiry containing working telephone number, service order number or purchase order number is processed. PB/NB and SNET do not currently support this function.

This function is not currently available in Ameritech Illinois.

Provisioning Order Status

This inquiry provides access to the service order provisioning information to determine the pending or dispatched status of a service order. The information provided presents the status of the order, such as whether it has been dispatched or notes regarding the order.

Access to this information is provided via the DataGate interface in the PB/NB region by customer number, service order number or telephone number. Access to this information is also available via the GUI named Provisioning Order Status for both the SWBT and PB/NB regions. SNET does not currently support this function.

This function is not currently available in Ameritech Illinois.

The following table summarizes the provisioning functions currently available in the SBC regions.

RECORD TYPE	SWBT	PB/NB	SNET	Ameritech
865	• SOC • Jeopardy Notice	• SOC • Jeopardy Notice	• SOC	• SOC
870	NA	NA	NA	Jeopardy Notice
Proprietary Message Event via Datagate	• Pending Order Status	• Provisioning Order Status	NA	NA
Graphical Data Provided via the Order Status and Provisioning Order Status GUIs	• Pending Order Status • Provisioning Order Status • Posted Order Status	• Pending Order Status • Provisioning Order Status	NA	NA

D. Maintenance and Repair

Available Interfaces

All SBC Companies offer some form of application to application and GUI trouble administration interfaces. Ameritech, PB/NB, and SWBT all support application to application interfaces for Electronic Bonding Trouble Administration (EBTA). Application to application interfaces are based on the American National Standards Institute (ANSI) Standards. SNET offers a non-standard application to application interface, MSAP, to support POTS maintenance and repair functions. The functions and attributes supported by EBTA are defined with each CLEC through a Joint Implementation Arrangement (JIA).

All regions in SBC have developed their own GUI interface. Each GUI supports various functions with different presentations to the end user.

PB/NB offers Pacific Bell Service Manager (PBSM). It allows a customer to: Create a trouble report, view trouble history, retrieve trouble status and perform MLT tests on Resale POTS and loop with port.

SWBT offers Toolbar/Trouble Administration. It allows a customer to: Create a trouble report, view trouble history, retrieve trouble status and perform MLT tests on Resale POTS and loop with port.

SNET offers CCTools, that allows a customer to view trouble history and retrieve trouble status.

Ameritech Illinois offers EBTA II GUI. It allows a customer to: Create a trouble report, view status history, receive proactive status, clear and close trouble reports. It provides similar functionality to the application to application interface.

The following table is a summary of the maintenance and repair application to application and GUI interfaces in the various SBC regions.

SYSTEM	SWBT	PB/NB	SNET	Ameritech
APP -TO-APP	System: Electronic Bonding – TA T1.262:1998 (Release 4.5 8/99) T1.227A (Release 5.1 10/99) T1.228:1995 T1.227:1995 Release 4.1.0	System: Electronic Bonding –TA T1.262:1998 (Release 4.5 8/99) T1.227:1995 T1.227A (Release 5.1 Oct/99) T1.228:1995 Release 4.1.0	System : MSAP EDI format, POTS (non ANSI Standard) Release: N/A	System: Electronic Bonding –TA Standard: T1.227:1995; T1.227a:1998 T1.228:1995 Release: 5.0
GUI	System: Toolbar / TA Create Trouble Reports MLT Test POTS / loop with port View trouble history View status View trouble report list. Clear and Close GUI-Windows Based Release 5.1.0	System: PBSM Create Trouble Reports MLT Test POTS / loop with port View trouble history View status View trouble report list. Telnet –VT100 Terminal Emulation Release: 8.3	System: CCTools View trouble history View status GUI-Windows based Release: NA	System: EBTA II GUI Create Trouble Reports View status history Receive status View status View trouble report list. Clear and Close GUI-Windows Based Release: 1.0

The following table shows the business functions that can be performed by the various regional GUIs. The business functionality and the screen designs are different for each region. In most cases the information entered into the fields on the GUI is mapped to data fields in the back end Operating Support Systems (OSS).

FUNCTION	SWBT (TOOLBAR –TA)	PB/NB (PBSM)	SNET (CCTOOLS)	Ameritech (EBTA GUI)
Create				
Circuit Types	Yes	Yes	No	Yes
(Telcordia valid circuit ids)				
Access Hours	Yes	Yes	No	Yes
(test and premise access hrs)	Yes	Yes	No	Yes
Narrative	Yes	Yes	No	Yes
Trouble Type	Yes	Yes	No	Yes
Dispatch Authorization	Yes	Yes	No	Yes
Contact information	No	No	No	Yes
TSP Priority	No	No	No	Yes
Status Interval	No	No	No	Yes
Comments /Notes				
Cancel	No	No	No	Yes
Modify info after create	No	No	No	Yes
Messaging	Yes	Yes	No	Yes

Get Status (refresh)	Yes	Yes	Yes	Yes
Modify	No	No	No	Yes
Proactive Statusing	No	No	No	Yes
Escalations	No	No	No	Yes
Clear / Close	No	No	No	Yes
History	Trouble	Trouble	Trouble	Ticket Status
MLT Test	Yes	Yes	No	No
Status notification	No	No	No	Yes
Estimated Repair Time	No	No	No	Yes
WEB Version	No	No	No	Yes
Circuit Security Supports MCN, ACNA, or CCNA	Yes	Yes	No	Yes (not MCN)
Close out Narrative	Yes	Yes	No	Yes
Circuit Inventory	Yes	No	No	No
Binding Post	No	Yes	No	No

E. Billing

The CLEC billing interfaces have been organized into four categories:

- Bill Data Tape (BDT)
- Exchange Message Interface (EMI) Daily Usage
- Electronic Data Interchange (EDI)
- Online Viewing/GUI

Bill Data Tape (BDT)

All SBC regions, SWBT, PB/NB, SNET and Ameritech, provide CLECs with billing data related to their purchase of unbundled network elements (UNEs). The primary billing vehicle for billing UNEs is Carrier Access Billing System (CABS), which produces the BDT file format. All four regions adhere to the same CABS Billing Output Specifications (BOS) national standards for bill media, software version control, user documentation, and user notification. Additionally, all SBC regions provide BDT data on comparable output mediums that include electronic transmission and tape.

There are other differences in the BDT records produced for CLECs across the SBC regions, but these are due largely to region-specific tariff and contracts and will continue to exist until such time as cross-region tariffs and contracts are negotiated.

Exchange Message Interface (EMI)

SBC has a responsibility to provide CLECs with usage messages that may be used in the billing of their end-customers. The CLECs receive usage files containing EMI records that provide the billing details for individual messages. The four SBC regions follow industry-accepted Ordering and Billing Forum (OBF) EMI format for message exchange.

At the inception of local exchange competition, Incumbent Local Exchange Carriers (ILEC) independently worked with CLECs to interpret the application of the OBF EMI guidelines, due to lack of complete and definitive industry guidelines. These region-specific interpretations resulted in the population of EMI records that currently differ somewhat amongst the SBC regions.

Ameritech Illinois provides notification of changes in EMI record formats through its TCNet 45 days in advance of implementation. Other SBC regions provide this notification via the Accessible Letter process 60 days in advance.

Electronic Data Interchange (EDI)

The SBC regions provide CLECs with billing information that originates from their core retail billing systems representing primarily the Resale of local exchange service. Currently, SWBT and PB/NB provide this billing information following the EDI 811, version 4010 telecommunications industry guidelines for billing transactions. The other two regions, Ameritech and SNET, are currently providing Resale billing information under a Telcordia (Bellcore) standard, the AEBS 450.

Online Viewing/GUI

SWBT offers a GUI application, Bill Info, as part of its desktop Toolbar that provides on-line access to billing information. This application provides on-line access to the image of the CLEC's rendered bill. There has been limited use of this capability by only three CLECs. Recent collaborative meetings with representatives of the CLEC community did not identify an interest in on-line access to the rendered bill.

Online Viewing of Resale and UNE bill images is not available in the other SBC regions, including Ameritech Illinois.

The table below summarizes the currently available interfaces, versions and bill delivery methods previously described.

Billing	SWBT	PB/NB	SNET	Ameritech
EMI	Record Format: EMR/EMI	Record Format: EMR/EMI	Record Format: EMR/EMI	Record Format: EMR/EMI
(for Daily Usage Delivery)	Transmit to CLEC	Transmit or tape to CLEC.	Transmit to CLEC.	Transmit or tape to CLEC by State.
BDT	System: CABS	System: CABS	System: CABS	System: CABS
	Standard/Format: Bill Data Tape (BDT)	Standard/Format: Bill Data Tape (BDT)	Standard/Format: Bill Data Tape (BDT)	Standard/Format: Bill Data Tape (BDT)
	Version 32	Version 32	Version 32	Version 32
EDI/AEBS	System: Electronic Data Interchange Billing (EDIB)	System: Electronic Data Interchange Billing (EDIB)	System: Customer Records & Information System (CRIS)	System: Ameritech Billing Management System (ABMS)
	Standard: EDI 811	Standard: EDI 811	Standard: Bellcore Mag Billing Tape Plan	Standard: Bellcore Mag Billing Tape Plan
	Record Format: 4010	Record Format: 4010	Record Format: AEBS 450	Record Format: AEBS 450
	Same Info as Paper Bill	Same Info as Paper Bill	Detail Supporting Summary Paper Bill	Detail Supporting Summary Paper Bill
	Transmit to CLEC	Transmit to CLEC	Magnetic Tape or Cartridge	Transmit to CLEC or Alternative Media
Online Viewing	System: TOOLBAR/Bill Information Function: CLEC can view Resale & UNE bill including payments/adjustments, CSR, and Subscription reports.	None	None	None

F. Connectivity

Although all regions within SBC currently offer CLECs connectivity to OSS, there are some differences in the form of connectivity offered, the type of facility utilized, and the ownership and maintenance of connectivity equipment.

In both its SWBT and PB/NB regions, SBC currently has a Remote Access Facility (RAF) that is solely dedicated for CLEC use in accessing SBC's OSS. The SWBT facility, known as the LRAF, is located in Dallas, Texas, while the PB/NB facility, called the PRAF, is centered in Fairfield, California.

Both the LRAF and PRAF are configured with a number of routers capable of terminating private line and frame relay connections and with access servers to terminate analog modem and ISDN dial-up connections. These terminating routers and access servers are connected to a Local Area Network (LAN) which in turn provides for connectivity to the SBC network "firewall" systems. These secured firewalls use access lists to prevent unauthorized entry into other internal SBC systems that are outside the scope of those OSS offered to CLECs.

Routers for the LRAF and PRAF are provided and maintained by SWBT and PB/NB. CLECs provide their own circuit, DSU/CSUs, connectors and cables. Specifications are given to the CLEC for the DSU/CSUs (to be placed on both ends of the CLEC provided circuit) and as well as circuit line coding and framing parameters.

SNET currently allows access to its OSS via their New Haven, Connecticut network connectivity location, but does not maintain a separate facility dedicated just for CLEC use. Private line and shared frame relay connections are allowed, but dial-up access is not available. CLECs must provide and maintain their own router and CSU/DSU. Hence, CLECs are given access to SNET's premises to install and maintain their own equipment. As part of the SNET merger initiative, work was done during 1999 to establish a dedicated facility (to be called the SRAF) for CLEC use within the SNET region. The building and testing of the private line and frame relay portion of the SRAF is slated to take place during the first quarter 2000, with plans to secure and install the addition of access servers to terminate analog modem and ISDN dial-up connections shortly thereafter.

CLEC connectivity to most of Ameritech's OSS is via private line or frame relay. However, some applications are accessed via the Internet, where security is provided via the use of Digital Certificates. For private line or frame relay connections, CLECs must provide their own CSU/DSU which is then installed and maintained by Ameritech personnel. Ameritech Illinois provides connectivity to its OSS via either Ameritech's Chicago, Illinois or Southfield, Michigan Electronic Commerce Network (ECN) rather than through a separate facility dedicated for CLEC use.

The table below compares the present method of operation and the varying connectivity-related items within the four SBC regions.

Item/Function	SWBT	PB/NB	SNET	Ameritech
Dedicated CLEC Facility	Yes	Yes	No	No
Private Line / Frame Relay connections	Yes	Yes	Yes	Yes
Dial-up Connections	Yes	Yes	No	No
SBC provides and maintains routers	Yes	Yes	No	Yes
CLEC provides circuit and CSU/DSUs	Yes	Yes	Yes	Yes
SBC installs and maintains CSU/DSUs	Yes	Yes	No	Yes
Internet access using Digital Certificates	No	No	No	Yes

III. FUTURE METHOD OF OPERATION (FMO)

Through the PMO evaluation, SBC has identified OSS process and interface modifications for Ameritech Illinois. The following section details Ameritech Illinois' plans to develop and implement these modifications in the pre-ordering, ordering, provisioning, maintenance and repair, and billing interfaces. The deployment plan will comply with the ICC SBC/Ameritech merger conditions and timeline.

A. Pre-ordering

There are three planned changes scheduled for the pre-ordering interface during the eighteen months following the SBC/Ameritech merger close. The first will be the addition of new functions to the current EDI interface. Certain pre-ordering functions will be made available to provide interactive access to data previously provided by Ameritech Illinois only through Data Validation Files. These functions will be available in April 2000.

This will be followed by the introduction of an updated version of the current EDI application to application interface in March 2001. This version of the interface will provide additional functionality, update the interface to a more recently available version of OBF and TCIF standards, and make CORBA available as an alternative to EDI.

At the same time, in March 2001, a pre-ordering GUI interface will be made available to CLECs in Ameritech Illinois. This GUI interface will provide access to pre-ordering functionality similar to that available on the application to application interface.

The following pre-ordering functionality is planned for the updated application to application and GUI interface.

Address Validation Inquiry
The Address Validation function will continue to be available in Ameritech Illinois. As part of the updated application to application and GUI interfaces, it will provide access to validated address information by address or working telephone number. This working telephone number inquiry will be available for residential service only. Address information will also continue to be available as a Data Validation File.

Common Language Location Indicator (CLLI) Inquiry
This function will be made available in Ameritech Illinois via the updated application to application and GUI interfaces in March, 2001.

Connecting Facility Assignment (CFA) Inquiry
This function will be first made available as part of the functionality addition in April 2000. Based on the input facility number, this function may be used to verify the status of a connecting facility prior to

submitting this information on a local service request. This function will be made available in Ameritech Illinois via both the updated application to application and GUI interfaces in March, 2001.

Customer Service Information Inquiry

This function will continue to be available in Ameritech Illinois. It will be available via both the updated application to application and GUI interfaces in March, 2001, and will provide for the retrieval of customer service records for accounts belonging to the requesting CLEC or to Ameritech Illinois retail units, but not when accounts are owned by another CLEC. CSI records may be retrieved using account telephone numbers or individual working telephone numbers.

Data Validation Files

Data Validation Files will continue to be available in Ameritech Illinois. The directory names, class of service codes, USOC, community names, yellow page headings, feature/service availability, and PIC/LPIC code files will be available via Connect:Direct, CD-ROM or downloadable using the pre-ordering GUI. Due to its size, the street address guide will be available only via Connect:Direct and CD-ROM. The content and format of the Data Validation Files will be modified.

Digital Subscriber Loop Pre-qualification Inquiry

This function will not be available via this plan in Ameritech Illinois either in the application to application or GUI interfaces. This choice is based on CLEC feedback, and on the availability of the Loop Qualification Inquiry.

Digital Subscriber Loop Qualification Inquiry

Ameritech Illinois will furnish CLECs with access to a loop qualification function that can be used to qualify loops on a pre-order basis. This function will provide the CLECs with the information needed to make an informed business decision regarding its ability to provide DSL-based service to a specific end user. This function will be first made available as part of the functionality addition in April 2000 as described more completely in the xDSL POR filed with the FCC on 12/7/99, and will then be available via the updated application to application and GUI interfaces in March 2001.

Directory Listing Inquiry

This information will continue to be available using the Customer Service Information Inquiry. Additionally, a Directory Listing function will be made available in Ameritech Illinois via the updated application to application and GUI interfaces in March 2001. The function will provide for the retrieval of listing information by either account telephone number or individual working telephone number. This function will be available for accounts belonging to the requesting CLEC or to Ameritech Illinois retail units, but not for accounts owned by another CLEC.

Dispatch Inquiry

The Dispatch function will be made available in Ameritech Illinois as a standalone inquiry via the updated application to application and GUI interfaces in March 2001.

Due Date Inquiry

The Due Date function will continue to be available in Ameritech Illinois, and will be available via both application to application and GUI interface as a standalone inquiry function in March, 2001. If alternate dates are requested, a total of thirty available dates will be returned.

Feature/Service Availability Inquiry

The Feature/Service Availability function will be made available in Ameritech Illinois as part of the functionality addition to the current application to application interface in April 2000. This function will be available via both the updated application to application and GUI interfaces in March 2001. This same information will also continue to be available as a Data Validation file.

Network Channel/Network Channel Interface (NC/NCI) Inquiry

The Network Channel (NC) and Network Channel Interface (NCI) Codes Inquiry function will be first made available as part of the functionality addition to the current interface in April 2000. This function will be available in Ameritech Illinois via both the updated application to application and GUI interfaces in March 2001.

Pending Order Status Inquiry

Pending Order Status functionality will be made available in Ameritech Illinois via the updated application to application and GUI interface in March 2001. A list of pending service order information will be provided by working telephone number and detailed service order information will be supported by working telephone number, customer number or purchase order number.

PIC/LPIC Inquiry

This function will continue to be available in Ameritech Illinois. It will be available via both the updated application to application and GUI interfaces in March, 2001. This same information will continue to be available as a Data Validation file.

Telephone Number Availability

The currently available Telephone Number functions (inquiry, reservation, confirmation, and cancellation) will be supported in the updated application to application and GUI interfaces available in March 2001. The telephone number reservation period will be increased to thirty calendar days.

The following table summarizes the pre-ordering functions to be provided via the updated application to application and GUI interfaces in March 2001. Those functions that will be available in April 2000 are marked with an asterisk (*).

Function	Updated Application to Application and GUI interface
Address Validation	Numbered, Unnumbered, Unnamed, Descriptive inquiry
	WTN inquiry
Common Language Location Identifier (CLLI)	CLLI inquiry
Connecting Facility Assignment (CFA)*	CFA inquiry
Customer Service Information (CSI)	ATN inquiry
	WTN inquiry
Data Validation Files	SAG, PIC/LPIC, Features/Services, Yellow Page Headings, USOCs
	Direct:Connect, CD-ROM, Download via GUI
DSL Pre-qualification Inquiry	Loop Qualification inquiry
Directory Listing Inquiry	ATN inquiry
	WTN inquiry
Dispatch	Dispatch inquiry
Due Date Inquiry	Inquiry Next available due date and 29 alternate dates available
Feature/Service Availability*	List of Features/Services by USOC
NC/NCI Validation*	Validation inquiry
Pending Order Status	Pending inquiry
PIC/LPIC List	Code inquiry Data Validation File
TN Availability	Inquiry 10 TNs
	Reservation 1 TN
	Confirmation
	Cancellation

B. Ordering

An ordering GUI will be implemented providing the CLECs with a robust set of order submission and order management functions. It will be consistent in data field terminology with the OBF LSOG, have functionality equivalent to that of the application to application interface, and will be provided in March 2001.

Differences between SBC regions identified in the PMO will be addressed in response to the Uniform and Enhanced OSS requirements set forth in the FCC Merger Conditions released on October 8, 1999. As a result, some elements of the current EDI message flow will be modified. However, these changes will take place beyond the timeframe considered by this Ameritech Illinois POR, and will be fully described in the Plan of Record filed with the FCC.

To improve the ordering process for xDSL-capable unbundled loops, some modification of data field usage will be made effective in December 2000. These changes will be more fully described in specifications provided as part of the advance notification process, but will include:

- Utilizing the LSR Customer Number (CNO) field as a tracking code for pre-order loop qualification
- Requesting line conditioning using the LSR Service or Product Enhancement Code (SPEC) field
- Requiring the LSR Type of Service (TOS) field to indicate whether a loop is for residence or business service
- Validating that an available loop can support the requested Power-Spectrum Density (PSD) class before confirming a received order

C. Provisioning

An enhancement to currently provided provisioning functionality is planned for March 2001. This enhancement will put into place two inquiry and response transactions that will provide access to service order status information pertaining to the provisioning of a CLEC's purchase orders. These transactions, Pending Order Status and Provisioning Order Status, will be available in addition to the existing Jeopardy Notification and Service Order Completion transactions.

Jeopardy Notification

Jeopardy notification will continue to be provided in Ameritech Illinois on the application to application interface, and will be a function of the ordering GUI interface available in March 2001.

Service Order Completion

Service Order Completion notification will continue to be provided in Ameritech Illinois via the ordering interface using the 865 transaction, and will be a function of the ordering GUI interface available in March 2001.

Pending Order Status

Pending Order Status functionality will be available via the updated pre-ordering application to application and GUI interfaces in March 2001.

Posted Order Status

Posted Order Status functionality will not be made available in Ameritech Illinois. The capability to provide this function does not currently exist within Ameritech, and it is therefore also not available to Ameritech Illinois retail customer service representatives.

Provisioning Order Status

Provisioning Order Status functionality will be available via the updated pre-ordering application to application and GUI interfaces in March 2001.

D. Maintenance and Repair

SBC will enhance its current standardized application to application interface and GUI for Maintenance and Repair in Ameritech Illinois in 2Q/00. The following business functionality will be added:

- MLT Testing functionality for application to application and GUI

  This will enable CLECs to test resold POTS and loop with port. This will allow a faster determination of the trouble source without Ameritech manual intervention. This ability will allow a CLEC to test the loop while the customer reporting the trouble is still on the call.

  The application to application interface will be compliant with the ANSI T1.262 industry standard. The GUI will provide identical functionality via an SBC-supplied user interface.

- GUI edits to conform to TRFD3 (ECIC Trouble Report Format Definition)

  Reduce the amount of information necessary to report trouble on a POTS or loop with port line by using enhanced industry guidelines. This will simplify and streamline the process for reporting troubles through the GUI, and will give the GUI the same functionality as the application to application interface.

- GUI Activity Duration window to show billable hours

  The Activity Duration window will provide the CLEC with information on what type of repair activity occurred (e.g., dispatch, after hours repair), while clearing a special services trouble. This will supply details on the duration of each activity and whether or not it was billable, and will give the GUI the same functionality as the application to application interface.

MLT testing will be made available in Ameritech Illinois in April 2000. The other two changes will be made available June 2000 as part of the FCC merger stipulation.

The following table summarizes the enhancements to be made to the maintenance interfaces in second quarter 2000.

SYSTEM	Ameritech
APP -TO-APP	System: Electronic Bonding – TA • MLT Test POTS/loop with port Standard: T1.262
GUI	System: EBTA II GUI • MLT Test POTS / loop with port • GUI Edits to conform to TRFD3 • GUI Activity Duration window for special services

E. Billing

There some deviations from current industry standards in the CLEC billing elements produced in Ameritech Illinois. Bill Data Tape (BDT) output standards are mature, since they have been used for access billing for several years. Consequently, the use of BDT in Ameritech Illinois is largely consistent with industry standards. Conversely, the industry evolved ahead of the formulation of industry EMI guidelines, so deviations in the implementation in Ameritech Illinois exist. Ameritech Illinois had adopted a former Bellcore standard for Resale electronic bill presentation. SBC will align the essential elements of these CLEC billing attributes consistent with industry guidelines and direction.

Bill Data Tape (BDT)

The BDT in Ameritech Illinois is consistent with the most current version of the applicable standards. Therefore, no changes are planned to the Bill Data Tape in Ameritech Illinois.

Ameritech Illinois will continue to implement future BDT releases as appropriate.

Exchange Message Interface (EMI)

To provide consistency in the application of industry guidelines, SBC will provide the following enhancements:

- Region-wide standardization on the suite of resolved OBF issues that target the local market. The changes originating from the OBF issues that will be implemented in Ameritech Illinois are:
  - 010162 record – ISDN (Circuit Switch Digital)
  - 101019 record – Move of class features from 100118 to 100119
  - OBF issue 1932 - UNE/P Access Header/Trailer/Detail/Summary records
- Provide a single user guide encompassing all 13 states. Details will be documented in that single SBC user guide.
- Increase notification period for planned EMI changes to sixty days.

Approved OBF guidelines as appropriate will continue to be implemented by Ameritech Illinois.

Electronic Data Interchange (EDI)

Ameritech Illinois will begin using EDI 811, version 4010 Telecommunications Industry Forum guidelines, for creation of Resale bills. Use of the EDI 811 for this purpose is a commonly accepted industry practice, and will reflect the Ameritech Illinois paper bill format. This enhancement will be available in January 2001. Ameritech Illinois also will provide a 30-day notification for monthly implementations and at least 90 days for version changes.

Online Viewing/GUI

There are no plans to create an on-line access capability for viewing bill images. Lack of current CLEC utilization in other regions of the SBC Toolbar application for billing, where available, and the absence of expressed interest during a prior CLEC collaborative billing forum suggest there is no business need for this capability.

F. Connectivity

In the Ameritech region, SBC will build a dedicated Remote Access Facility (to be called the ARAF) which will provide CLECs dedicated access to the application-to-application interfaces and Graphical User Interfaces being implemented in Ameritech Illinois. SBC will also provide Internet access for the Graphical User Interface being introduced in Ameritech Illinois.

The ARAF will use TCP/IP protocol and will be configured with: 1) routers capable of terminating private line or frame relay connections, and 2) access servers to terminate analog modem and ISDN dial-up connections. SBC will install and maintain these routers and will provide CLECs with specifications for the DSU/CSUs that are to be placed on both ends of the circuit. CLECs will provide their own circuit to the ARAF, the DSU/CSUs, as well as connectors and cabling from their CSU/DSU to the SBC router. Application-to-application interfaces will be accessible only via the CLEC's private line or frame relay connection to the ARAF and will not be accessible by a dial-up connection or the Internet.

Common security will be provided by SBC's firewall systems that will use access lists to authorize ARAF users access to designated OSS. Dial-up access users of the GUI interface(s) will pass though the same security methods as private line/frame relay users but must also authenticate upon connecting to the SBC access server by supplying a unique UserID and password pair to log onto the SBC network. When a CLEC wants to use Internet access, SBC will utilize Digital Certificates to secure access. Uniform GUIs can be accessed through either the ARAF or the Internet.

Documentation describing connectivity requirements and procedures for the ARAF will be standardized and made available to CLECs desiring connectivity to SBC OSS. Once the ARAF goes into production in the fourth quarter 2000, any CLEC wanting to establish connectivity for the first time or CLECs wanting to upgrade their existing connection, will be provided specifications for connecting to the dedicated ARAF facility. CLEC connections to any other facility within Ameritech Illinois will become grandfathered and no new CLEC connections will be made to such non-dedicated facilities.

Below is a list of items and functions regarding connectivity that will become the future method of operation in Ameritech Illinois for secured access to SBC's OSS.

- Dedicated CLEC Facility
- Private Line / Frame Relay connections
- Dial-up Connections
- SBC provides and maintains routers
- TCP/IP protocol used
- CLEC provides circuit, CSU/DSUs, connectors and cables
- CLEC provides publicly registered IP addresses for both ends of the private line or frame relay connection
- SBC installs and maintains CSU/DSUs
- Internet access (available for GUIs only) is secured by use of Digital Certificates
- Standard CLEC connectivity documentation
- Grandfather existing CLEC connectivity arrangements

In some cases, to make use of the Ameritech Illinois OSS interfaces via the ARAF, certain software requirements must be met by the accessing CLEC.

- For pre-ordering application to application EDI access, Interactive Agent software per the Electronic Commerce Implementation Committee (ECIC) Interactive Agent specification will be used. For the CORBA protocol, non-repudiation of EDI requests will not be supported and message receipts will be required. CORBA security will be in accordance with T1M1 T1.265 security specifications.

- The pre-ordering and/or ordering GUI will be accessed via browser software, such as Internet Explorer (version 4.0 or greater) or Netscape Navigator (version 4.0 or greater.) Communications will be secured with the Secure Socket Layer (SSL), X.509 digital certificates and individual user IDs and passwords.

E. Timeline

Ameritech Illinois FMO Timelines -- Release Schedule

Milestones	Availability Date
OSS Interfaces	
Use of Accessible Letter for Notification	
• **Implementation**	4/1/2000
Pre-ordering, Ordering, and Provisioning	
Pre-ordering Functionality Addition	
• Release Announcement	12/16/1999
• Initial Release Requirements	1/14/2000
• CLEC Testing Start Date	3/18/2000
• **Implementation**	4/3/2000
Ordering Changes for xDSL	
• Release Announcement	2/2000
• Initial Release Requirements	4/2000
• CLEC Testing Start Date	11/2000
• **Implementation**	12/2000
Updated Pre-ordering Application-to-Application Interface	
• Release Announcement	5/2000
• Initial Release Requirements	7/2000
• CLEC Testing Start Date	2/2001
• **Implementation**	3/2001
Pre-ordering Graphical User Interface (GUI)	
• Release Announcement	12/2000
• Test Environment Access	2/2001
• **Implementation**	3/2001
Ordering Graphical User Interface (GUI)	
• Release Announcement	12/2000
• Test Environment Access	2/2001
• **Implementation**	3/2001
Repair and Maintenance	
EBTA and GUI Enhancements	
• Release Announcement	1/2000
• Initial Release Requirements	2/2000
• CLEC Testing Start Date	5/2000
• **Implementation**	6/2000

Billing

EMI Enhancements

- Final Release Requirements 1/2001
- **Implementation** 3/2001

EDI 811 Implementation

- Release Announcement 5/2000
- Initial Release Requirements 7/2000
- CLEC Testing Start Date 2/2001
- **Implementation** 3/2001

Connectivity

Ameritech RAF

- **Implementation** 12/2000

IV. GLOSSARY

2/6 Code	TIRKS “shorthand” abbreviation for Trunk Group
ACNA	Access Carrier Name Abbreviation
AEBS	Telecordia (PKA Bellcore) billing format standard.
Ameritech	The five-state operating region of SBC which encompasses the states of Ameritech Illinois, Indiana, Michigan, Illinois and Wisconsin.
ANSI	American National Standards Institute
ARAF	The data communications facility that provides a secure network interface from CLEC networks to Ameritech’s Data Communications Network (DCN).
ASC	Accredited Standards Committee - A designation for a industry body that has been given accreditation by the American National Standards Institute to issue ANSI standards. X12 and T1 are examples of such committees.
ASOG	Access Service Order Guidelines - The industry standard format documentation developed under the auspices of Ordering and Billing Forum (OBF) for the ordering of access services
ASR	Access Service Request - The industry standard format developed under the auspices of Ordering and Billing Forum (OBF) for the ordering of access services.
ATIS	Alliance for Telecommunications Industry Solutions
BDT	Bill Data Tape - Bill detail created in CABS which is predicated by the Billing Output Specifications (BOS) national standards.
BOS	Billing Output Specifications
CCNA	Carrier Customer Name Abbreviation
CESAR - ISR	Customer's Enhanced System for Access Requests – Interconnection Service Request - Is a “gateway” for several applications. It is utilized in the PB/NB region for pre-ordering for Resale and Unbundled Loops, and ordering functions for Unbundled Loops, Local Number Portability, and Interconnection trunks.
CLEC	Competitive Local Exchange Carrier
CMIS	Certified Local Exchange Carrier Mechanized Interface Specification - A document created to aid CLECs in preparation of an LSR for ordering Unbundled Network Elements and Resale Services in the SNET region.
CMP	Change Management Process - Process negotiated between ILEC and CLECs to communicate changes made to the Operational Support Systems
Connect:Direct	A product of Sterling Commerce used to transport data files.

CORBA	Common Object Request Broker Architecture (CORBA) is an industry standard protocol for the mechanical exchange of data between computer systems.
CPO	Combined Platform Offering - An Ameritech unbundled network element platform (loop with port) offering.
DataGate	An SBC proprietary application to application interface for the mechanical exchange of pre-ordering information.
DSU/CSU	Data Service Unit/Channel Service Unit. The DSU part of the unit is the device used in digital transmission for connecting Data Terminal Equipment (DTE), such as a router, to Data Communications Equipment (DTE) or to a service. The CSU part of the unit is a digital interface device that connects end user equipment to the local digital telephone loop. (DTE) and data circuit termination equipment (DCE) for terminals
EBTA	Electronic Bonding Trouble Administration
ECIC	Electronic Communications Implementation Committee (ECIC) is an industry forum that develops a common understanding of electronics communications standards and develop guidelines for the implementation of electronic information exchange
EDI	Electronic Data Interchange - An industry standard protocol for the mechanical exchange of data between computer systems.
EMI	Exchange Message Interface - Usage record format for message exchange which is developed under the auspices of the Ordering and Billing Forum (OBF).
ESOG	Electronic Service Order Guide - A document created to aid CLECs in preparation of an LSR for ordering Unbundled Network Elements and Resale Services in the Ameritech region.
EXACT	Exchange Access Control and Tracking - The industry standard for ordering access services.
FMO	Future Method of Operation
FTP	File Transfer Protocol - A common industry defined data transmission polling protocol.
GUI	Graphical User Interface - A user-friendly presentation of data input screens.
GUI-Web	Web based GUI
ISO	International Standards Organization
ITU-T	International Telecommunications Union - Telecommunication
JIA	Joint Implementation Arrangement – arrangement between SBC and Application to application customers regarding implementation of mandatory and optional fields defined in T1M1.5 standard, as well as timing, security, measurements, etc.

LEC	Local Exchange Carrier
LEX	LSR Exchange - A GUI application available to CLECs for ordering LSR-based local services from SBC.
LRAF	The data communications facility that provides a secure network interface from CLEC networks to Southwestern Bell's Data Communications Network (DCN).
LSOG	Local Service Order Guidelines - The industry standard format documentation developed under the auspices of Ordering and Billing Forum (OBF) for the ordering of local service Resale, Number Portability, Unbundled Network Elements (UNE) Loops and Ports.
LSOR	A document created to aid CLECs in preparation of an LSR for ordering Unbundled Network Elements and Resale Services in the SWBT and PB/NB regions.
LSPOR	A document created to aid CLECs with pre-ordering inquiries to exchange certain information prior to the submission of an LSR for ordering Unbundled Network Elements and Resale Services in the SWBT and PB/NB regions.
LSR	Local Service Request - The industry standard format developed under the auspices of Ordering and Billing Forum (OBF) for the ordering of local service Resale, Number Portability, Unbundled Network Elements (UNE) Loops and Ports.
M&P	Methods and Procedures
MIB	Managed Information Base
NPA	Numbering Plan of North America
NXX	Local Exchange Number
OBF	Ordering and Billing Forum - The industry forum that develops the guidelines for ordering Wholesale Local and Access services.
OSS	Operation Support System
PB/NB	Pacific Bell/Nevada Bell - The two-state operating region of SBC which encompasses the states of California and Nevada.
PMO	Present Method of Operation
PRAF	The data communications facility that provides a secure network interface from CLEC networks to the PB/NB Data Communications Network (DCN).
RAF	The Remote Access Facility is the regional access point available to CLECs for direct or dial-up connectivity to the SWBT and Facility
SBC	The corporate entity which encompasses the Ameritech, PB/NB, SNET and SWBT regions.
SNET	Southern New England Telephone - The SBC operating region which includes the state of Connecticut.

SRAF	The data communications facility that provides a secure network interface from CLEC networks to Southern New England Telephone's Data Communications Network (DCN).
SWBT	Southwestern Bell Telephone- The five-state operating region of SBC which encompasses the states of Arkansas, Kansas, Missouri, Oklahoma, and Texas.
T1M1	Industry standard body that develops inter-network operations standards and support the CORBA data model for pre-ordering.
TA	Trouble Administration
TCIF	Telecommunications Industry Forum - An industry standard body that produces the EDI mechanization specifications for the LSOG.
TCNet	A Web-based GUI available to CLECs that provides for the mechanical exchange of pre-ordering information.
TCP/IP	Transmission Control Protocol/Internet Protocol
TRFD3	Trouble Report Format Definition
UNE	Unbundled Network Element
USOC	Universal Service Order Code - The industry standard ordering codes associated with products and assigned by the Universal Service Order Standards at Telcordia.
Verigate	A GUI available to CLECs that provides for the mechanical exchange of pre-ordering information.
W-CIWin	Wholesale Customer Information Window - An SNET proprietary system that facilitates Resale and UNE order processing by enabling integrated access to the operational support systems.
WSM	Wholesale Service Manager - An Operational Support System that provides ordering and flow through capability and data element validation for Resale services.
X.25	Developed by the ITU-T as an interface between data terminal operating in the packet mode on public data networks

Attachment A-2

SBC/Ameritech Illinois Plan of Record Follow-up Letter

February 1, 2000

Via Internet E-Mail

Mr. Sam McClerren
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Re: Ameritech Illinois' OSS Plan of Record
Filed January 7, 2000
Docket No. 98-0555

Dear Mr. McClerren:

The Plan of Record ("POR") submitted by Ameritech Illinois complies with the Illinois Merger Order and reflects the information which the Company has available to it at this point in the process. The issues raised by the parties will be addressed in the Illinois collaborative (or are currently being addressed in other CLEC collaboratives). However, to expedite the Illinois OSS collaborative process, Ameritech Illinois hereby provides further clarification on certain of these issues.

Change Management

Ameritech already has a regional Change Management Process ("CMP") which has been in place since June 1999. This was developed collaboratively with the CLECs well before the SBC/Ameritech merger. The CMP provides a means by which Ameritech Illinois and the CLECs can work cooperatively to introduce changes to the OSS interfaces. The process includes specific intervals, such as, when documentation and initial specifications will be delivered to the CLECs for review and input. Ameritech Illinois is committed to using the CMP to deliver the changes identified in the POR.

A 13-state CMP is currently being addressed in a separate CLEC collaborative effort. The 13-state CMP is expected to be approved by the CLECs in March. Once implemented, Ameritech Illinois will use this process in lieu of the current regional process.

As part of the implementation of the 13-state CMP, Ameritech Illinois has agreed to provide a versioned, production-like test environment that will include processing of transactions through its service order negotiation system.

The Company agrees that there needs to be a process that addresses business process changes that fall outside the scope of the CMP. Ameritech Illinois is committed to putting in place by April 2000 a process by which these changes can be addressed, including the establishment of OSS user forums.

Standards

Ameritech Illinois is committed to implementing systems that conform to industry standards. For example, Ameritech Illinois indicated in the POR's pre-ordering sections that it would introduce an updated version of the current EDI application-to-application interface in March 2001. The Company is also in the process of updating its ordering system to EDI 10 (LSOG4) with a scheduled completion for August 2000. This was underway before the merger was approved. Most CLECs are participating in this effort through the existing Ameritech Illinois CMP.

Ameritech Illinois will work with the CLECs through the CMP process to determine the appropriate version of the industry standard that will be implemented in the updated interfaces. Because a strict adherence to the standard might result in loss of existing functionality, the CMP will also be used to determine any appropriate deviation from that standard.

The proposed changes to the existing interfaces will form the basis for uniform interfaces across the 13-state SBC region. Uniform UNE billing and application-to-application ordering interfaces will be introduced within the time frame contemplated by the FCC merger conditions.

Very truly yours,

Theresa Larkin
Vice President
Regulatory Affairs

cc: Patrick McLarney
Frank Bodine
Nancy Atkinson
Commenting Parties via E-Mail

Attachment B-1

AT&T Reply to SBC/Ameritech Illinois Plan of Record

COMMENTS OF AT&T
CONCERNING
THE SBC/AMERITECH OSS PLAN OF RECORD FOR ILLINOIS
January 21, 2000

AT&T Communications of Illinois, Inc. ("AT&T") submits its Comments in response to the Plan Of Record (hereafter also "Plan" or "POR") issued by SBC/Ameritech on January 7, 2000.[1] For the reasons set forth below, the Commission should reject the Plan as submitted by SBC/Ameritech and require it to be revised and completed before proceeding to the OSS collaborative.

Background and Introduction

The Illinois Merger Conditions provide that "Joint Applicants shall implement a *comprehensive plan* for improving the OSS systems and interfaces available to CLECs in Illinois." Id. (Emphasis supplied.) The OSS Condition, which was initially proposed by SBC/Ameritech as a merger commitment and ultimately adopted by the Commission, with certain modifications, calls for a three-phase process. Phase 1 of that process is the development of a Plan of Record which is to consist of

> an overall assessment of SBC's and Ameritech's existing OSS interfaces, business processes and rules, hardware and data capabilities, and security provisions, and differences, and the companies' plan for developing and deploying application-to-application interfaces and graphical user interfaces for OSS, as well as integrating their OSS processes. Id.

[1] These Comments are submitted pursuant to Paragraph 29 of the Merger Conditions adopted by the Commission in its Order of September 23, 1999 in SBC Communications Inc., SBC Delaware Inc., Ameritech Corporation, and Illinois Bell Telephone Company, d/b/a Ameritech Illinois, Joint Application for approval of the reorgznization of Illinois Bell, etc., Docket No. 98-0555 (the "Merger Order") pp. 243-264.

The POR is to be “accepted or rejected” by the Commission following an expedited CLEC comment cycle and Staff recommendation. The OSS Condition further specifies that in Phase 2 “SBC/Ameritech shall work collaboratively with ICC Staff and Illinois CLECs, in a series of workshops, to obtain written agreement on OSS interfaces, enhances, and business requirements identified in the Plan of Record.” Phase 2 is scheduled to run for three months. At its conclusion Phase 3, which is the implementation and testing phase, begins.

In this framework, the Plan of Record serves as the basis for collaborative discussions between SBC/Ameritech, ICC Staff and CLECs. Further, as it is developed in the collaborative process, the POR will describe the improvements to OSS systems and interfaces to be implemented by SBC/Ameritech. The issue for the Commission at this point, therefore, is whether the POR as produced by SBC/Ameritech is adequate to serve as the basis for the collaborative process and should be accepted, or whether it has deficiencies necessitating further work on their part before the parties and Staff proceed to the collaborative.

For the reasons set forth below in these Comments, the POR is seriously incomplete and deficient, and it does not provide an adequate basis for going forward into the collaborative. As described in Section I, the POR identifies various changes to Ameritech’s OSS for pre-ordering and ordering functions effective April 1, 2000, but in describing its “Future Method of Operation” it fails to provide the most important

(and basic) information about the nature of those changes.[2] In the absence of such information, however, CLECs are in no position to prepare for and participate in the Illinois collaborative process, much less to design and build preordering and ordering systems of their own in order to go into business. Moreover, as discussed in Section II, SBC/Ameritech have failed in their plan to address essential business rules and processes, including operations directly associated with and affected by the planned OSS changes. These omissions as well render the Plan seriously incomplete.[3] Consequently, the Commission should reject the POR as published and require SBC/Ameritech to correct it, as described below.

I. The OSS Plan Of Record Omits Elements That Are Essential To An Understanding And Assessment Of The Planned Systems Changes And Thus Are A Necessary Predicate To The Collaborative Process

As noted above, the Commission in Merger Condition 29 adopted a framework for OSS improvements that proceeds on the basis of a Plan of Record produced in the first instance by SBC/Ameritech. The POR is the document that is to be taken to the collaborative process with Staff and CLECs and is to be the foundation for discussing and ultimately assessing the adequacy of SBC's proposed system changes in Illinois. If the POR is incomplete in material respects, or if it is otherwise flawed or unacceptable, it cannot serve its intended purpose, and the remainder of the process

[2] Indeed, in important respects SBC/Ameritech has explicitly withheld information, saying it will be made available only when required in connection with the merger conditions ordered by the FCC. POR, p. 28. SBC/Ameritech in fact sought rehearing on this point, requesting the Commission to "synchronize" the OSS collaborative timelines, including that for filing a Plan of Record, with the timetable under the FCC merger conditions. See Joint Applicants' Application For Rehearing, filed October 25, 1999. The Commission denied that request.

will be adversely affected. Moreover, as a practical matter, significant shortcomings or gaps in the POR cannot be remedied during the collaborative process itself. Paragraph 29 provides that if the CLECs and SBC/Ameritech have not reached agreement after *one month* of collaborative discussions, a list of issues is to be submitted to the Commission for arbitration. There will not be time for SBC/Ameritech to fill in major gaps and uncertainties in the Plan once the collaborative begins. The POR must be sufficiently complete that the parties can analyze it and prepare for collaborative discussions to attempt to arrive at a document that can truly be said to be a "comprehensive plan for improving the OSS systems and interfaces available to CLECs in Illinois." The POR as published falls seriously short of that standard.[4]

A. Pre-Ordering

As described in the "Present Methods of Operation" discussion (POR, pp. 4-5), Ameritech has used "Electronic Data Interchange" ("EDI") as the basis for its pre-order interface. Ameritech began the work to create this interface in 1996, before the industry standards-setting body, ATIS,[5] had adopted standards for pre-ordering. Subsequent generations of the industry standards, known as the "Local Service Order

---

[3] For convenience, a "checklist" of the more significant omissions and deficiencies discussed in these comments is included as Attachment A.

[4] The discussion which follows focuses on the EDI application-to-application interfaces, since they are the interfaces on which AT&T expects to rely most heavily with Ameritech and the other RBOCs.

[5] Alliance for Telecommunications Industry Solutions is the organization that publishes industry standards, guidelines and operating procedures used by interexchange and local carriers to support interoperability of the carriers. Its key committees whose work establishes the standards for pre-ordering and ordering are the Ordering and Billing Forum ("OBF") and the Telecommunications Industry Forum ("TCIF"), and the standards are known as the Local Service Ordering Guides ("LSOG") and the Electronic Local Mechanized Specifications ("ELMS").

Guidelines" or "LSOG," have come and gone. LSOG Version 3 standards were adopted by the industry in May, 1998, and LSOG 4 conventions became the industry standard in June of 1999.[6]

As to SBC/Ameritech's plans for the pre-ordering system, the POR refers only to "the introduction of *an updated version* of the current EDI application to application interface" to occur in March 2001. This version of the interface will "provide additional functionality" and will "update the interface to *a more recently available version* of OBF and TCIF standards." POR, p. 27. Remarkably, however, SBC does not disclose *what* version of the standards it is planning to move to in March 2001. In fact, according to SBC/Ameritech's timeline, the "Release Announcement" for the up-dated pre-ordering application-to-application interface is not until May of 2000, which is likely *after* the Phase 2 collaborative under the schedule established in the Merger Order. It seems reasonable to ask just what it is that SBC/Ameritech expect to "collaborate" on with respect to the pre-order interface?

This omission is not a trivial matter. An enormous amount of effort has been devoted to the industry forums that have developed these standards, and a CLEC for its part must know what version of the Local Service Ordering Guidelines the ILEC is

---

[6] The industry standards serve three purposes: (1) they define what transactions types can be exchanged and what those transactions mean (i.e., the business function they are to accomplish); (2) they specify what data elements are necessary to accomplish the transactions; and (3) they establish what the characteristics of the data elements should be (e.g., number of characters in a field, whether the field is to contain alphabetic or numeric characters, and whether the field is required, optional or conditional). When an RBOC's specifications are said to be "compliant with the standard," it means that all three characteristics have been achieved.

implementing, and the extent of the ILEC's compliance with that standard.[7] SBC/Ameritech fully understand the importance of this fact, and the omission of this information cannot have been inadvertent.

If SBC/Ameritech is planning to move the Ameritech pre-ordering interface to LSOG 4 and be fully compliant with those standards, it should state that fact in the Plan of Record prior to the commencement of the collaboratives. If it intends to define and develop its interface with known deviations from the LSOG 4 standards, it should so state and disclose with specificity the extent to which the interface will conform to and depart from the industry standards. If SBC/Ameritech has no plan as to which industry standard it intends to implement for pre-ordering in the Ameritech region, it is important to know that from the outset as well. The collaborative process should consist of discussions of SBC/Ameritech's OSS plans and whether they are adequate to support CLECs' needs and foster local competition; it should not be consumed by CLECs and Staff trying to ferret out the basics of *what those plans are*.

Similarly, the POR contains high-level descriptions of changes Ameritech intends to make by April of 2000 in pre-ordering functions. POR, pp. 27-29. However, it fails to provide the most elementary information on the manner in which these

---

[7] The level of compliance with LSOG standards tells the CLEC community important information about the functions the ILEC will be making available. For example, Customer Service Record ("CSR") inquiries that are serviced with a "fielded" response (i.e., each piece of data is provided in a pre-defined location and format within the response) are known as "parsed" or fielded Customer Service Records. Ameritech's retail systems use fielded CSRs to generate service orders for changes to products, services and features of its end users. Access to parsed CSRs is equally important to CLECs. Full compliance with the LSOG 4 standard would include parsing of CSRs; less than full compliance with LSOG 4 might or might not, and LSOG 3 compliance would not. In any event, that is something that should be a part of the Plan of Record, not deferred until after the collaborative as proposed by SBC/Ameritech.

changes are to be implemented, and absent such information CLECs are unable to discern how such functional changes could be implemented and used. This problem is magnified by the fact that Ameritech has for so long maintained its pre-ordering interface with such little regard for prevailing industry standards. For example, the POR states that the "Network Channel (NC) and Network Channel Interface (NCI) Codes Inquiry function will be first made available as part of the functionality addition to the current interface in April 2000." This function, depending upon the manner in which it is designed and implemented, could allow CLECs to query the Ameritech databases to determine the Network Channel and Network Channel Interface[8] codes assigned to any loop on the basis of the customer's telephone number or circuit number. This is critical information that must be provided on CLEC requests for loop migrations or other loop provisioning activity. If Ameritech had communicated its design of the function, CLECs would know if it will be beneficial or not.[9] In the case of other RBOCs it might be possible to predict the way in which these functions likely would operate, because the pre-ordering functions

[8] These codes reflect the composition of the loop; for example, there are codes representing analog 2-wire ground start and loop start, digital loops with bandwidth specification and the like.

[9] Also, this information may be presented differently in different geographic areas depending upon switch type or other central office variations. CLECs need an understanding of these differences in order to be able to evaluate this proposed functional change.

that provide NC/NCI data are consistent with database queries and other pre-ordering functions that, in turn, are aligned with industry standards. In the case of Ameritech, however, this is not the case, and without basic information on the ways in which these queries and responses will be handled, CLECs lack any basis on which to begin to engage in a collaborative.

B. Ordering

The treatment of the ordering function in the POR is, if anything, even more glaringly uninformative. As the Present Methods of Operation discussion reveals Ameritech lags behind with respect to the LSOG and TCIF standards for ordering. For more than two years, Ameritech's systems have remained static while updates to industry standards have been published by ATIS/TCIF. During that period CLECs have been working with other RBOCs to migrate toward the standards as they evolve, recognizing that incremental changes toward full compliance with the standards is preferable to huge "leaps" that skip over entire versions or generations of the standards. Ameritech's current ordering interface is a pre-LSOG 2 version[10] and thus it lags a full two versions behind the current industry standards (and behind the versions used in the other SBC territories, see POR pp. 12-13).

In these circumstances the salient question for Ameritech is "What version of industry standards for ordering is to be implemented by April of 2000 and in what manner is it to be implemented (e.g., to what extent is it consistent with the standards)?" The POR, astonishingly, does not provide the answers. There is no

[10] SBC/Ameritech list the Ameritech ordering interface as LSOG 2, but that is not consistent with technical representations made by Ameritech to AT&T as recently as January 19, 2000 and AT&T's experience, which is that it in fact is on an incomplete version of LSOG 2.

mention of plans to implement LSOG 3, or LSOG 4, and in fact there is no discussion of any effort to move toward compliance with standards *at any level*. This failure is inconsistent with the very notion of a Plan of Record for OSS improvements, and it is inconsistent with SBC/Ameritech's commitment to "deploy. . .commercially ready, application-to-application interfaces, *as defined adopted, and periodically updated by industry standard-setting bodies for OSS*. . . ." Merger Condition 29 (emphasis supplied).[11]

Again, this information is fundamental to and should be a part of any OSS Plan of Record. Moreover, this is not a question of a few missing "details" that could be supplied in the collaborative process. It would be unfair to CLECs, working under an extremely compressed schedule, to take up limited collaborative time garnering such basic information about SBC/Ameritech's plans. Moreover, it would not be in accord with the procedural framework which SBC/Ameritech proposed and the Commission adopted, as

---

[11] Similarly, Ameritech states that it intends to build a Graphical User Interface (GUI) to support (primarily) smaller CLECs in ordering products and services from Ameritech. But, as with the application-to-application interface, Ameritech fails to specify the version of standards to which this interface will conform or the extent to which it will conform. Moreover, according to SBC/Ameritech's Illinois timeline, the release announcement for the ordering as well as pre-ordering GUI is not until *December 2000*. Again, there is not much that can be said in the upcoming collaborative about a GUI interface that is yet to be described in any meaningful way.

discussed above. In structuring this process as it has, the Commission's evident intent was for the collaborative to be an examination of plans set forth, comprehensively, in the POR, including discussion of the considerations that went into those plans and exploration of options and alternatives to determine if better solutions are available. It is for SBC/Ameritech in the first instance to lay out their plans for interface improvements such that CLECs can reasonably evaluate and critique them and suggest needed improvements. It has not done so. The POR omits vital elements, and thus it fails to provide the basis for a collaborative discussion. These shortcomings are not subtle, and SBC/Ameritech should be required to curve the omissions to the plan before proceeding.[12]

C. Billing

The billing discussion of the POR is also so vague and equivocal that it fails to convey the essentials of SBC/Ameritech's plans. The POR acknowledges that "[t]here

---

[12] It is disturbing that SBC/Ameritech has fallen so short in this, virtually its first act of "compliance" with the merger conditions, and particularly disturbing in that all that was really required was not action or performance on SBC/Ameritech's part but merely for it to disclose its *plans*.

are some deviations from current industry standards" in Ameritech's CLEC billing (POR, p. 32). With respect to the Exchange Message Interface (EMI), for example, the POR states that "deviations in the implementation in Ameritech Illinois exist." SBC/Ameritech state that they will "align the *essential elements* of these CLEC billing attributes consistent with industry guidelines and direction" and that "[a]pproved OBF guildelines *as appropriate* will continue to be implemented by Ameritech Illinois." Id. The Plan is short on specifics, however, and the qualifying language (e.g., "essential," "as appropriate") leave SBC/Ameritech practically complete latitude to decide, in the future, what it is willing and unwilling to do in achieving compliance with the industry standards. No CLEC has the ability to plan changes to the ways in which it receives and processes Ameritech billing data when Ameritech reserves the ability to decide which standards it will meet, what deviations will remain and when they will be remedied, if at all. CLECs have complained to Ameritech for some time that its UNE billing hinders

CLECs from using Ameritech billing media effectively and efficiently;[13] the POR fails even to address the issue

D. System Integration

Merger Condition 29 provides that the Plan of Record shall include the companies' plan for "integrating their OSS processes." The POR in the "Present Methods of Operation" section describes in some detail differences in functionality that currently exist among the SBC regional entities. Nowhere, however, does the plan describe or even discuss plans to provide CLECs with interfaces that are integrated across SBC's regions. Consistent with Condition 29, the Plan should describe how the OSS interfaces will be made uniform, how and when the integration will take place, and whether any of the interfaces will gain or lose characteristics or functions as a result of integration. Absent this information, CLECs are seriously hampered in their ability to assess the changes that have been disclosed and to collaborate on those changes in Phase 2.

[13] The billing that Ameritech provides today is not computer-processable, and it is inconsistent with well established industry standards. ATIS has issued the Carrier Access Billing System Billing Output Standard (CABS BOS) Version 32. Ameritech has implemented CABS BOS Version 32. Currently, AT&T receives bills from Ameritech formatted in CABS, AEBS, or the "Customer Records Information System" or CRIS, and in each case through a mix of electronic and paper copies.

II. The Plan Of Record Fails to Address Essential Business Processes Relating to OSS

The SBC/Ameritech POR also rests on an overly narrow view of subject areas that need to be addressed.[14] It is confined essentially to the actual OSS interfaces themselves, and largely disregards associated business processes and rules that in many instances govern the ways in which ILEC and CLECs interact in connection with the OSS functions and interfaces. This narrow focus is inconsistent with SBC/Ameritech's OSS commitment: As noted above, the Plan of Record in SBC/Ameritech's own words was to "consist of an overall assessment of SBC's and Ameritech's existing OSS *interfaces, business processes and rules*, . . .and the companies' plan for developing and deploying application-to-application interfaces and graphical user interfaces for OSS*, as well as integrating their OSS processes*." Merger Condition 29. The FCC in its recent UNE Remand Order[15] has reiterated that Operations Support Systems is defined to

[14] The Plan mentions xDSL, for example, (e.g., POR at 26), but does not include that information in this document, apparently because of the separate on-going POR/collaborative effort on that topic. AT&T recognizes that xDSL is explicitly the subject of the FCC's merger condition, but certainly xDSL should be incorporated into a comprehensive Illinois OSS Plan.

[15] *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, September 15, 1999 (the "UNE Remand Order").

include “the manual, computerized and automated systems, *together with associated business processes*. . . .”[16]

The approach taken in the POR is at odds with this definition. Examples of areas in which SBC/Ameritech have excluded operations methods and procedures that have direct and consequential bearing on OSS operations are set forth below.

Loop “hot cut” processes.[17] The provision of loops via hot-cut is governed by business rules that are established by each of the SBC regional entities. The procedures that enable Pacific Bell, for example, to provide California CLECs with coordinated hot-cuts and efficient loop transitions to CLEC switches are known throughout the industry. The Ameritech hot-cut loop process is known to be far less efficient, far more prone to creating lapses in end user service and seen as a competitive barrier to providing service to end users, efficiently and reliably, from CLEC switches. The Plan does not address these processes and makes no provision for incorporating processes of other SBC entities into Illinois, thus improving OSS performance.

---

[16] UNE Remand Order, ¶425.

Electronic order "flow-through." Another example of business rules that come into play in connection with OSS interfaces are those that impact the rate of service order flow-through. A CLEC order that "flows-through" the Ameritech system is one that is processed electronically in the OSS interface and in the Ameritech legacy systems (i.e., service order processor, billing system, customer records database) – all without manual intervention on the Ameritech side of the interface. Ameritech's SBC affiliates report flow through rates that indicate a lower incidence of manual intervention relative to Ameritech. Manual intervention increases the likelihood that errors and delay will be introduced into order processing. The Plan does not mention this issue or address improvements that Ameritech intends to make, or that it even considers to be candidates for collaboration, in the area of order flow-through. The Plan of Record should include Ameritech's view of the improvements it will take to incorporate revised operations procedures to enhance CLEC order flow-through rates.

CLEC Access to Testing of Changes to Ameritech OSS Interfaces. Many of the changes that Ameritech has announced within as well as outside of its Plan of Record will require complementary development work by CLECs of their systems and interfaces. These are complex systems in their own right, and an additional layer of complexity is introduced as they are interfaced with Ameritech's systems. Consequently, CLECs have an ongoing need for access to an Ameritech testing facility

---

[17] "Hot cut" is industry terminology for the cooperative efforts on the part of ILEC and CLEC to move the termination of a subscriber's line to another service provider's switch. In a hot cut process, as distinguished from a loop migration, the customer does not lose service.

to evaluate the working of their OSS interfaces with Ameritech's, and whether changes made to Ameritech's systems introduce failures in the passing of orders, particularly via the application-to-application electronic interfaces. Indeed, because CLEC development intervals will not necessarily match Ameritech's, multiple testing and production environments must be made available as Ameritech migrates its production systems from one version of industry standards to another. Otherwise, CLECs risk service outages or the needless stranding of investment. The Plan of Record is entirely silent on these issues.

Ameritech Support Services For System Changes. The POR indicates Ameritech's intention to add interfaces (e.g., a Web-GUI for pre-ordering and another for ordering) that will make new features and functions available, and as discussed above it indicates in general terms an intent to migrate its application-to-application interfaces to more current industry standards. Such changes impact CLEC operations that are supported today by Ameritech Information Industries Service Centers or the Ameritech Resource Center. The POR is silent on the manner in which Ameritech will support CLECs during the course of such OSS changes, and it makes no provision for any additional support services in connection with them. The Plan is thus incomplete, in that CLECs cannot address the adequacy of planned changes without a description of the associated mechanisms supporting the changes.

Publication of Specifications and Documentation. The changes and additions that Ameritech makes in its OSS interfaces will need to be documented comprehensively and accurately across the various modes of publication used by CLECs in connection with the interfaces. The specifications and other information

needed by CLECs must be adequate and readily accessible. Ameritech must publish the documentation and specifications in ways that make them accessible to CLECs. Ameritech has employed various methods in the past several years; for example, it now uses its Electronic Service Ordering guide. In other of the SBC regions, however, the methods of publication differ from Ameritech's. Southwestern Bell, for example, uses its Local Service Order Requirements. There are updating protocols that the various SBC entities use that offer CLECs different ways to access the information, and there are different types of specification documents that some of the SBC entities (other than Ameritech) make available to better enable CLECs to build interfaces to SBC's systems. Ameritech makes no information available in the Plan that indicates whether it intends to improve its current methods or not, whether it intends to implement one specific SBC entity's publication methodology, or whether it has any specific plans. The means that SBC elects to use for publishing specifications and documentation has significant ramifications for the CLEC industry, however, and the Plan of Record should address this topic.

Performance Measurement Changes. The Commission's Merger Order addresses performance measurement and a collaborative process is currently underway on that topic. The Plan of Record for OSS is not complete, however, unless it provides a linkage or mechanism by which *changes* to OSS are tied to *changes* or adjustments to performance measurements. The commitment to make improvements to OSS is meaningless unless those improvements are actually delivered to the marketplace, and that implies a system of measurements that demonstrates those

improvements. The OSS Plan is silent on performance measurement, and thus it treats the two topics as separate and isolated.

Change Management. SBC has been working with CLECs over the past few months on its Change Management Process. It has solicited CLEC input on issues such as notification intervals and methods as well as other parameters governing the ways in which changes are announced and communicated to CLECs. CLECs are pursuing other modifications to the Change Management Process that Ameritech would make in its systems to respond to industry needs. In particular, CLECs have attempted to improve the scope of the Change Management Process to include business issues and other operations matters that directly impact the CLEC interfaces with Ameritech.

The Plan of Record does not address the overall change management topic. It does not even indicate whether SBC intends to institute a common Change Management Process or whether it intends to maintain a separate process for Illinois. It fails to identify the scope and coverage of a change management process as it relates to OSS (i.e., is it limited to the interfaces themselves, or does it – as it should – extend to the associated business and operational changes). And most immediately, it fails to address the manner in which the additions and changes that are contemplated within the Plan itself (to the extent they are described) will be managed *vis-a-vis* CLECs. It is unacceptable that the Plan of Record, which is the first step in meeting the OSS commitment, ignores this vital topic. Orderly and effective change processes are integral to any "comprehensive plan for improving the OSS systems and interfaces available to CLECs in Illinois," and change management issues should be addressed specifically in the OSS context.

Conclusion

AT&T in these Comments has not attempted to provide a comprehensive list of shortcomings or issues with respect to the plans that *are* set forth in the POR. That is properly done in the Phase 2 collaborative. Rather, at this point we have enumerated significant omissions and gaps in the plan that must be supplied by SBC/Ameritech before proceeding to the next stage. Other parties likely will identify additional items, and we would hope that Staff will collect and catalogue the significant areas of omission comprehensively for the Commission in its report and recommendation. As discussed above, the Merger Condition on OSS sets out a coherent and logical progression from Plan of Record, to collaborative process, to implementation and testing, each stage of which builds upon the previous work. It is thus vital to get the POR "right," at least in the sense of its being complete and adequately informative, before proceeding to the Phase 2 collaborative.

Accordingly, the Commission should reject this POR and send it back for additional work, as discussed above.

Dated: January 21, 2000

Respectfully submitted,

AT&T Communications of Illinois, Inc.

By: _____

William A. Davis, II
David J. Chorzempa
Douglas W. Trabaris
Suite 1500
222 West Adams St.
Chicago, IL 60606

(312) 230-2636

ATTACHMENT A

Significant Omissions And Deficiencies in the Ameritech Illinois Plan Of Record for Operations Support Systems ("OSS")

The following is a brief "checklist," based on the AT&T Comments, of information and topics that should be included in SBC/Ameritech's OSS Plan Of Record:

1. Conformance with Industry Standards **– SBC/Ameritech must set forth plans to move to specified industry standards for its interfaces for** preordering, ordering, repair and billing, **including the extent to which each interface will conform to or diverge from the industry standards. Its Plans should identify the steps it will take to cure non-compliance over identified periods of time, with interim milestones. The Plan should also include full description of the manner in which proposed changes in functionality in its pre-ordering, ordering, etc. systems will be implemented.**

2. Change Management Process **– The POR should include the methods and procedures that Ameritech will follow in announcing changes to its OSS, interfaces and operations to the industry, and the timetables that it will use to implement changes according to the various types of changes. Changes include emergency fixes to software and systems, changes required to fulfill regulatory commitments, changes to conform systems and operations to achieve industry standards, and other process improvements. The Change Management Process also should provide a means for CLECs to request Ameritech to undertake improvements that are necessary for the industry.**

3. Documentation and Specifications **– The POR should describe the ways in which Ameritech will provide CLECs with updates to its OSS interface documentation and the technology it will use to distribute them or otherwise make them available to CLECs.**

4. Support Services Process **– The POR should include a description of the ways in which CLECs will receive technical support for implementation of interfaces with Ameritech's OSS. The magnitude of the changes over the next several years requires that CLECs be provided with technical and business support (e.g. through the Ameritech Support Centers and Ameritech Resource Center) so that CLEC interfaces can be maintained and be changed in conjunction with the Ameritech systems.**

5. CLEC Testing Environments **– The POR should include the computer systems and processes that Ameritech will make available for CLECs to test changes to interfaces with Ameritech prior to implementing the production versions of systems and interfaces. Testing will be required for interface changes in existing interfaces as well as for new interfaces that Ameritech will be providing.**

6. Performance Measurement Processes **– For the OSS changes that Ameritech intends to implement, the Plan should include corollary changes in its performance measurement systems. With new OSS functions and for those that involve changes in the ways CLECs interact with Ameritech, the ways in which they will be measured to demonstrate that they deliver the planned enhancements to operations should be specified.**

7. Business Processes **– Processes that surround the OSS functions should be addressed within the Plan to fully describe the nature of changes that Ameritech intends to implement. AT&T has mentioned two in its Comments,** loop "hot cuts" **and** order "flow-through" **that are obvious omissions from the Ameritech Plan.**

Attachment B-2

MCI WorldCom Reply to SBC/Ameritech Illinois Plan of Record

January 21, 2000

VIA AIRBORNE EXPRESS

Donna M. Caton
Chief Clerk
ILLINOIS COMMERCE COMMISSION
527 E. Capitol Avenue
Springfield, IL 62794-9280

Re: MCI WorldCom Response to Ameritech's Operational Support System ("OSS") Plan of Record Filed in Response to Condition Number 29 of the Commission's Order Granting the Ameritech/SBC Merger in Docket 98-0555

Dear Ms. Caton:

MCI WorldCom respectfully submits this response to the Operational Support System ("OSS") Plan of Record ("POR") that Ameritech filed with the Illinois Commerce Commission ("Commission") on January 7, 2000.

The Commission's order approving the merger of Ameritech and SBC required that Ameritech, among other things, complete a publicly available POR within three months of the merger closing date.[18] MCI WorldCom has reviewed Ameritech's POR and finds it non responsive to the Commission's Merger Order and wholly inadequate as a starting point for a collaborative in which parties are expected to obtain written agreement on OSS interfaces, enhancements, and business requirements identified in the POR. For these reasons, and as discussed in more detail below, MCI WorldCom respectfully requests that the Commission reject Ameritech's POR and direct Ameritech to expeditiously submit detailed specifications and business rules regarding OSS systems and improvements that it plans to implement in Illinois.

Contrary to the expectations embodied in the Commission's Merger Order, the POR provides absolutely no insight into substantive plans for the improvement, development and deployment and integration of OSS interfaces, business processes for Ameritech's OSS. Essentially the POR provides nothing more than a 10,000 foot view of OSS systems currently utilized by SBC and its various subsidiaries, including Ameritech. The document is really an executive summary -- a status report -- on systems in place, accompanied by announcements as to when further announcements

[18]SBC Communications, Inc., et al., Joint Application for Approval of the Reorganization of Illinois Bell Telephone Company, Illinois Docket 98-0555, Order, Sept. 23, 1999, ("Merger Order"), pp. 253-254.

will be made about substantive plans for the deployment of new systems, or modifications and improvements to existing systems.

The Section of the POR entitled “Ameritech Illinois FMO Timelines -- Release Schedule” at pages 36-37 of the POR highlights the lack of substance contained in the report. In bullet point format under each functional category of OSS, Ameritech has listed various OSS functions and dates corresponding to when it plans to make an announcement regarding its plans for those systems and when information regarding those plans will be released.

For example, according to the POR, the Commission, the third party tester and CLECs will not know exactly what Ameritech’s plans are with respect to how it plans to “update” its preordering application to application interface until sometime in May 2000. Business rules and specifications that provide the details essential to understanding what the systems are and what needs to be done to build to those systems will not be released until sometime in July 2000. With that schedule, it is contemplated that CLECs and the third party tester will not be able to begin testing until February 2001, and full implementation of the system (assuming it passes the tests) will not completed until March 2001. Other OSS functions contain similar announcement, information release, and implementation timelines.

In short, the Commission and the CLECs still do not know and will not know for sometime what systems and modifications are planned much less what the proposed business rules and specifications are that will enable CLECs and the third party tester to build to those systems. Absent specific and detailed information regarding identifiable systems and specifics as to how upgrades will be made to existing systems, it is impossible to engage in any constructive discussion regarding proposed OSS interfaces, enhancements, and business requirements which the Commission contemplated would take place in the Phase 2 collaborative.

The Commission’s Merger Order specifically rejected the Ameritech/SBC OSS commitment for the same infirmities that exist in the POR:

> We believe that Joint Applicants have been generally responsive in setting out a process for the planning, development, and deployment of fully operational and commercially available OSS in Illinois. However, we find that a more certain and expedited schedule and rigorous third-party testing and involvement are necessary to foster competition and to protect customers under the authority of §7-204(f) of the Illinois Public Utility Act.
>
> We are persuaded by a number of intervenors that the schedule and approach volunteered by the Joint Applicants is too indefinite. As perhaps few other elements of telecommunications provisioning are more

> critical to the flow of benefits from competition to consumers we find that the process for OSS development and deployment should be well defined and involve Commission input when necessary. The Joint Applicants have offered conflicting evidence on their asserted commitment to build a viable OSS system. While "committing" to

> having an operational OSS in 24 months the Joint Applicants phased plan would actually seem to require more than two years (5 months for Phase 1; 6 months for Phase 2; and 18 months for Phase 3) assuming no arbitration is necessary. The Commission is interested in establishing a definitive process which from beginning to end holds the Joint Applicants to their original two year time commitment.[19]

What the POR offers up is more of the same vague paper promises that Ameritech/SBC offered as commitments during the merger proceeding, leaving ample "wiggle" room for defining what they have, or have not, committed to in regard to developing and deploying commercially viable OSS in Illinois. The Merger Order called on Ameritech to bring forth "well defined" plans for development and deployment of OSS in the accelerated timeframe set by the Commission.[20] The POR is not responsive to the directives of the Merger Order. It does not contain substantive identification of systems, enhancements, specifications and business rules. Consequently, there is nothing of substance for Commission Staff, the third party tester, CLECs and Ameritech to discuss in the OSS collaborative which the Commission's Merger Order intended commence soon after the filing and "approval" of the POR. The sooner Ameritech provides the specifics, the sooner that process can begin.

In addition, the POR lacks any discussion regarding OSS functions and the extent to which they are dependent on back-office system capabilities, despite a recognition by Ameritech and SBC that such systems would be identified and included in their OSS evaluation and system upgrade plans.[21] As a result, there is no way for the Commission or CLECs to discern from the POR the interaction between specific back-office systems and OSS functionalities and the extent to which back-office system capabilities will impact proposed OSS improvements once the improvements are announced.

---

[19]Merger Order, p. 195 (emphasis added).

[20]Merger Odrder, pp. 195-197.

[21]Merger Order, p. 188.

Finally, MCI WorldCom notes that Ameritech appears to have punted its obligations with respect to development and deployment of OSS for Digital Subscriber Loop ("DSL") qualification to the Federal Communications Commission ("FCC"). Instead of addressing the Commission's directives with respect to the deployment of OSS functionalities for advanced services,[22] Ameritech's Illinois POR simply says that DSL qualification functionality will be accomplished as

described in the xDSL POR that Ameritech filed with the FCC on December, 7, 1999.[23] Much like Ameritech's Illinois POR its xDSL POR is deficient because it is overly vague and lacks any clear commitments.[24] Regardless of what Ameritech said in its xDSL POR, it is obvious that the Illinois Commission has given specific direction with respect to OSS for advance services. Instead of addressing that directive on OSS for advanced services, Ameritech's POR cavalierly declines to provide any specifics whatsoever about its intention to comply with this Commission's requirement that Ameritech:

> . . .shall ensure that OSS systems, once modified in the three-phase process to interface with CLECs, provide the following information in an online format available 24 hours a day: (a) physical medium of loops; (b) loop length in equivalent 26 gauge; (c) length and location of bridged taps and (d) the presence of load coils, repeaters, DLC systems, DAMLS or any other interferers or equipment which parties to the collaborative process deem necessary to provision loops for xDSL service in a non-discriminatory fashion.[25]

For all of these reasons, Ameritech's POR is non responsive to the directives in the Commission's Merger Order. The POR provides absolutely no insight into substantive plans for the improvement, development and deployment and integration of OSS interfaces and business processes for Ameritech's OSS and fails to provide a basis upon which discussions between Commission Staff, the third party tester, CLECs

---

[22]Merger Order, p. 197.

[23]Ameritech Illinois POR, p. 26.

[24]MCI WorldCom expressed its concerns about the xDSL POR directly to Ameritech. For the convenience of the Commission, MCI WorldCom has attached its response to Ameritech's xDSL POR to this correspondence.

[25]Merger Order, p. 197.

and Ameritech can move forward. Accordingly, MCI WorldCom respectfully requests that the Commission reject Ameritech's POR and direct Ameritech to expeditiously submit detailed specifications and business rules regarding OSS systems and improvements that it plans to implement in Illinois so that Phase 2 of Merger Order condition number 29 can move forward in earnest.

If you have any questions regarding this correspondence, please call me.

Very truly yours,

Darrell S. Townsley

Enclosures
cc: Chairman Mathias
Commissioner Harvill
Commissioner Hurley
Commissioner Kolhauser
Commissioner Kretschmer
Patrick E. McLarney
Frank Bodine
Sam McClerren
G. Darryl Reed
Thomas G. Aridas

Attachment B-3

Sprint Reply to SBC/Ameritech Illinois Plan of Record

January 21, 2000

VIA AIRBORNE EXPRESS

Donna Caton, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62794-9280

Re: Merger Condition 29, SBC/Ameritech OSS Plan of Record

Dear Ms. Caton:

Sprint Communications Company L.P. d/b/a Sprint Communications L.P. ("Sprint") hereby submits its comments to the OSS Plan of Record ("POR") filed by Ameritech Illinois. Sprint intends to participate in the collaborative process set forth in Condition 29 from the Commission's Order in Docket No. 98-0555. Sprint has several concerns regarding the POR as it has been submitted that are detailed below. Sprint recognizes, however, that much of the work to be done to identify improvements that must be made to Ameritech's OSS will be raised in the context of the collaborative process. Thus, Sprint reserves the right to raise additional issues during the collaborative process. Sprint's primary concern is that the POR and the collaborative process actually address the problems that CLECs have experienced with Ameritech's OSS and that solutions be developed. Full importation of SBC's OSS into Illinois without addressing CLEC concerns will avoid the spirit and the letter of the Commission's merger condition. As the Commission knows, fully functional OSS is crucial to the development of competition for all types of customers.

Sprint has been participating in the collaborative process related to OSS improvements for Advanced Services pursuant to the FCC Merger Conditions. As a result of its experience to date in that collaborative, Sprint offers that several improvements can be made to the Ameritech Illinois POR that will make the Illinois collaborative beneficial for all parties.

First, a clear identification and definition of the scope and ultimate desired outcome of the collaborative process should be defined. The POR includes the changes that SBC commits to make to Ameritech's OSS. The POR, however, contains no recognition of CLEC problems with Ameritech's current OSS and how the proposed processes will address the CLEC problems. The POR should include a matrix or action plan that will allow for a detailed analysis of current Ameritech business processes and rules to determine if the solutions proposed by SBC in the POR will solve the problems. Examples of areas where CLEC input could be added include: ordering UNE-P, 855 Transactions, Jeopardy Notification, FOC with changed Due Dates, Address Validation and Editing, xDSL Loop Pre-Qualification, Change Management Process, and CLEC Notification (TCNET). Without a recognition of CLEC problems with Ameritech's OSS, there will be no guarantee that any OSS changes made by SBC actually will address the problems and can be classified as improvements.

Second, the POR does not recognize that the ultimate goal of the collaborative process should be fully functional OSS that obtains the best systems from both SBC and Ameritech. Only then will SBC's promises to implement "best practices" be put into effect.

Third, the POR does not adequately address CLEC Requirements for xDSL loop qualification (at the Central Office level and loop specific), and UNE Ordering and Provisioning including the UNE platform. The parties must build upon the FCC collaborative process for Advanced Services OSS that SBC recently has initiated but within the timelines set forth in the Illinois merger order.

Finally, the POR does not address the third party testing requirements set forth in the Commission's Order. Certainly, the third party tester that the Commission selects will design and perform the testing, but the POR and the collaborative process must also address how CLECs will test systems with SBC/Ameritech. The POR should recognize that any testing and deployment schedules need to support varied CLEC requirements and roll-out schedules.

In sum, the POR fails in that it does not recognize and address various CLEC operational difficulties contained in Ameritech's OSS. The Commission's desire to improve OSS and hasten competition in Illinois will be achieved if the POR contains the elements mentioned above. Sprint looks forward to participating in the collaborative process and to achieving the goals set forth by the Commission in Merger Condition 29.

Sincerely,

Kenneth A. Schifman

KAS:sjw
cc: Sam McClerren

Mr. Sam McClerren
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62794-9280

Attachment B-4

Covad Reply to SBC/Ameritech Illinois Plan of Record

To: Illinois Commerce Commission

Re: Docket No. 98-0555
Ameritech Illinois Operation Support Systems Plan of Record

Date: January 21, 2000

Dear Ms. Canton:

Covad Communications Company submits these comments in response to the Ameritech Illinois OSS Plan of Record released on January 7, 2000. After reviewing SBC/Ameritech's submission, Covad is concerned that the Plan of Record does not provide sufficient detail as to how SBC and Ameritech will integrate their OSS systems and believes that these deficiencies must be addressed in the upcoming collaboratives and in a supplemental plan of record.

The Illinois Merger Conditions require that SBC/Ameritech file an Illinois Plan of Record that includes (1) an assessment of SBC's and Ameritech's existing OSS interfaces, business processes and rules, hardware and data capabilities, and security provisions; (2) the differences between the SBC and Ameritech systems; and (3) a "comprehensive" plan for developing, deploying, and integrating those OSS systems. (Illinois Merger Conditions, Condition 29.)

In its Plan of Record, SBC/Ameritech indicates that it has met all three requirements. SBC/Ameritech states that the Plan contains an analysis of the current operating environment and identifies differences in the OSS systems within the SBC operating regions. (Ameritech Illinois Plan of Record at 3.) SBC/Ameritech also states specifically that "[t]his document is designed to provide a comprehensive analysis and plan for a specific process for integrating [the Ameritech and SBC] OSS systems and to ensure that this integration process will not have an adverse impact on competition in Illinois." (Ameritech Illinois Plan of Record at 2.) In reality, SBC/Ameritech never progresses past the second requirement of the Illinois OSS Merger Conditions. Indeed, for almost twenty pages, SBC/Ameritech details the existing OSS interfaces, business processes and rules, hardware and data capabilities, as well as the differences between their respective systems. SBC/Ameritech fails, however, to address substantively the third requirement; SBC/Ameritech has not provided any "comprehensive" or detailed plan for its development of the Ameritech Illinois OSS system and its integration with the SBC systems. Instead, SBC/Ameritech presents a cursory statement of intended

enhancements in three categories: pre-ordering, ordering, and provisioning. A summary of the content of each category is provided below.

Pre-Ordering

SBC/Ameritech does not outline any significant enhancements to the Present Method of Operation except for the introduction of GUI and Corba interfaces in March 2001.

Ordering

SBC/Ameritech similarly promises to introduce a GUI interface for ordering functions in March 2001. While SBC/Ameritech states that "an ordering GUI will be implementing providing the CLECs with a robust set of order submission and order management functions[,]" (Ameritech Illinois Plan of Record at 28), SBC/Ameritech fails to specify or detail what CLECs should anticipate from the new OSS system.

SBC/Ameritech's stated improvements in the ordering process for xDSL-capable unbundled loops are equally undefined. Indeed, SBC/Ameritech states that "some modification of data field usage will be made effective in December 2000." (Ameritech Illinois Plan of Record at 29.) SBC/Ameritech then simply notes that these "changes will be more fully described in specifications provided as part of the advance notification process."

Provisioning

SBC/Ameritech's provisioning enhancements are equally sparse. Other than introducing an Order Status function by March 2001, SBC/Ameritech has not committed to any significant enhancements to the present methods of operation.

Covad is deeply troubled by SBC/Ameritech's lack of substantive OSS commitments and failure to develop or detail the few "enhancements" SBC/Ameritech has promised to implement. For example, while recognizing that the current SBC and Ameritech OSS systems are highly disparate, the Ameritech Illinois Plan of Record does not address how the systems will be reconciled in the future. Furthermore, the Future Methods of Operation makes no attempt to align Ameritech Illinois' OSS interfaces with industry standards as defined by the Order and Billing Forum ("OBF") and the Telecommunications Industry Forum ("TCIF"). When will the Ameritech and SBC OSS systems be integrated and when will Ameritech Illinois' pre-ordering and ordering OSS systems be aligned with current industry standards? As it stands, Covad does not know when and where these issues will be resolved.

Covad is also troubled by SBC/Ameritech's unilateral exemption of certain functions from the Plan of Record. For example, SBC/Ameritech states that "the commitment to provide direct access to SBC's SORD, or the equivalent service order processing system in the SNET and Ameritech states, as specified, in [Paragraph] 28 of the ICC SBC/Ameritech Merger Conditions, is based on an actual CLEC request specifying the functionality desired. An

assessment of this area will not be addressed in this document, but will be made following an actual CLEC request defining the scope of these projects." (Ameritech Illinois Plan of Record at 3.) With this statement, SBC/Ameritech has opted to hide from its obligations by claiming that it need not do anything until a CLEC makes a specific request for SORD. SBC/Ameritech's position is contrary to the plain language of the ICC Merger Conditions, as SBC/Ameritech itself acknowledges.

If SBC/Ameritech requires further scope definition, then the requirements gathering process should be performed in concert with the Illinois Plan of Record, not as a follow-up to the Illinois Plan of Record. In systems development, a claimed lack of understanding of requirements is a tactic often used by the systems developer to shift focus from the systems developer's inability to meet the requirement to the end-user's alleged lack of specificity. Although the tactic is commonly used in the Information Technology industry, it has no place in the Illinois Plan of Record.

SBC/Ameritech apparently justifies its cursory treatment of Illinois OSS issues by repeated passing references to the two OSS Plans of Record that SBC/Ameritech has filed with the Federal Communications Commission. It is not enough, however, for SBC/Ameritech to simply refer to its actions to comply with its federal obligations; SBC/Ameritech has independent obligations under the Illinois Merger Conditions that are intended to ensure that the merger benefits the citizens of the State of Illinois. One of these conditions requires that SBC/Ameritech file a specific OSS Plan for Illinois and discuss, in detail, how the Ameritech Illinois OSS system will be enhanced and integrated with the SBC systems. SBC/Ameritech has failed to meet that requirement. Under the Illinois Merger Conditions, Covad and other CLECs are entitled to know what SBC/Ameritech will do specifically to improve the Ameritech Illinois OSS system and how the Illinois Plan relates to the two federal Plans of Record. SBC/Ameritech should not be allowed to shirk its responsibility with passing references to the parallel FCC OSS Plans of Record for "xDSL and Advanced Services" and "Uniform and Enhanced OSS."

Covad hopes that SBC/Ameritech will rectify these deficiencies in the next step of the OSS Merger Condition process. The Illinois Merger Conditions provide that, in Phase 2 of the "Additional OSS" process, SBC/Ameritech and the CLECs will participate in a series of collaborative workshops. As an active participant in the collaboratives arising from the FCC xDSL and Advanced Services Plans of Record, Covad has significant doubts about how the collaborative for the Illinois Plan of Record will proceed. In the xDSL and Advanced Services Plan of Record Collaborative, the CLECs provided comprehensive comments on a significantly more detailed SBC/Ameritech Plan of Record; yet SBC/Ameritech summarized the CLEC comments into generalized categories and the CLEC community's comments and questions never received the detailed responses they deserve. Given the very general nature of the Ameritech Illinois Plan of Record, Covad is concerned that it is even less likely that SBC/Ameritech will address Covad's and other CLECs' specific issues and concerns.

Nonetheless, Covad would like to request a meeting with SBC/Ameritech and the CLEC community to discuss these issues and other issues raised by CLECs in an attempt to

resolve them. Covad remains hopeful that SBC/Ameritech will increase its substantive commitments and provide much-needed detail in its Illinois Plan of Record through the upcoming collaborative process and will memorialize those commitments within the next thirty days in a supplemental plan of record.

Very truly yours,

Felicia Franco-Feinberg
Regional Counsel
Error! Bookmark not defined.s Company

cc: Samuel McClerren, Illinois Commerce Commission
Terry Moya, Covad Communications Company
Valerie Evans, Covad Communications Company

Attachment B-5

CoreComm Reply to SBC/Ameritech Illinois Plan of Record

BEFORE THE
ILLINOIS COMMERCE COMMISSION

SBC COMMUNICATIONS INC.,	:	
SBC DELAWARE INC.,	:	
AMERITECH CORPORATION,	:	
ILLINOIS BELL TELEPHONE COMPANY	:	
d/b/a AMERITECH ILLINOIS, and	:	
AMERITECH ILLLINOIS METRO, INC.	:	
	:	98-0555
Joint Application for approval of the	:	
reorganization of Illinois Bell Telephone	:	
Company d/b/a Ameritech Illinois, and the	:	
reorganization of Ameritech Illinois Metro,	:	
Inc. in accordance with Section 7-204 of the	:	
Public Utilities Act and for all other	:	
appropriate relief.	:	

Comments of CoreComm Illinois Regarding SBC/Ameritech's Plan of Record for OSS Interfaces and Processes.

Pursuant to Condition 29 of the September 23, 1999 Order of the Illinois Commerce Commission (Commission) in the above captioned proceeding, CoreComm Illinois Inc., (CoreComm) respectfully submits its comments concerning the Plan of Record made publicly available by SBC/Ameritech on January 7, 2000.

CoreComm is a facilities-based telecommunications provider in Illinois, and, as such purchases unbundled network elements (UNEs) and services for resale from Ameritech Illinois. CoreComm currently has considerable experience in providing facilities-based service to residential customers in Ohio, and expects to begin provisioning both residential and business customers on a facilities basis in Illinois in the very near future. As a "start-up" facilities-based competitor to Ameritech Illinois,

CoreComm views the effective *and meaningful* implementation Condition 29 as a critical to the development of residential competition in Illinois. The following comments are not intended to constitute an exhaustive list of CoreComm's criticisms of the Plan of Record. CoreComm reserves its right to raise additional issues within the collaborative process. The following comments constitutes the list of major issues identified by CoreComm within the timeframe provided by the Commission's Order.

General Comments

As an initial observation, the issue of third-party testing should be addressed within the OSS collaborative process. SBC/Ameritech's Plan of record makes no mention of third-party testing, as did the corresponding Ohio OSS Implementation Plan, issued on January 6, 2000. An SBC/Ameritech proposal for third party testing should be included in the Plan of Record as a starting point for discussions within the collaborative process.

Also, the Plan of Record does not address the subject of an OSS process for hot cuts. In the Ohio OSS collaborative, the CLECs requested that SBC/Ameritech import the hot cut process available in the Pac Bell region. An improved hot cut process is essential to CLEC's in the Ameritech region and the subject should be addressed in the context of the OSS collaborative in Illinois.

The Plan of record omits any reference to the support for ordering complex business products. Currently, Ameritech's Ordering interface does not support an electronic order format for complex business products such as "NEW" Centrex. LSR forms for the complex business products. SBC/Ameritech should have an OBF standard or GUI interface to order such complex products until such time an OBF LSR standard is created, if one does not exist.

The Plan of Record does not address the need for “true” OBF and TCIF compliant implementations. An example of a non-standard implementation of the OBF standard is demonstrated by the current “best practice” of the SBC operating regions using the LSOG 3 OBF standards for ordering , but using the X12 3072 version of the EDI standard. The published ATIS standard shows LSOG3 with X12 4010. There should be a standard implementation of the OBF and TCIF guidelines as documented by ATIS to utilize the prescribed data elements per the LSR ordering rule standards and electronically interfacing using the X12 EDI standard as presented by TCIF for the corresponding OBF LSOG release.

The Plan of record includes no mention in either the PMO or FMO of whether the existing 836 PIC / LPIC change notification process, as well as the process for local line loss notification will be included or excluded. This information is important to CLECs like CoreComm to understand it’s future behavior within the SBC best practices.

SBC/Ameritech’s 12 month view for suggested OSS changes should be included in the Illinois Plan of Record. Attached hereto, as Appendix A, is a copy of Ameritech Identified Changes, covering 2000, distributed at the December CLEC Forum in Chicago.

Also, the Plan of Record should address the ordering of directory listings. CLECs like CoreComm would like to order the service and the listing both on one electronic order. Currently CoreComm is ordering the service via EDI to AIIS and the directory listing is faxed to AADS, once CoreComm has received a FOC and a service order number from AIIS on a EDI 850 purchase order.

Comments on Specific Provisions

Concerning Section II.A., in the discussion of EDI message flow, SBC/Ameritech should clarify whether the reference to "864 transaction" should actually be a reference to an "865" transaction.

In Section II.A., Pre-Ordering – Pending Order Status Inquiry, no mention is made in the PMO of a CLEC's need to check TCNET for the new 869/870 Status Request and Status Report transactions. This process should be addressed in the Plan of Record.

Regarding Section II.B., an important issue concerning versions of PONS was not addressed in the process flow. Ameritech can not send a transaction to the CLEC on a PON version that has already been transmitted. When Ameritech rejects an order in error. They can not adjust that specific order to make corrections. They create a new order, attach the same PON with a version in the 9000 range. This does not match the CLEC system and every one of these falls to manual within CLEC organizations. This also skews the measurements. The LEC appears to be on time with a response (rejection) to the CLEC. When they open another order – an additional order is tagged to the CLEC (it should not be) and this order is open, worked and transmitted back to the CLEC within a short time period (again skewing the measurements). This type of order should be reopened at Ameritech, re-worked without inflating the order numbers, having a receive date/time of the initial order receive date/time and an end time of the corrected order transmission back to the CLEC. The time should span the time Ameritech initially got the order to the time it was sent back correctly to the CLEC. This way, Ameritech will take steps to correct the errors both made by their service reps and their system.

In Section II.B., Ordering – Available Interfaces – 836 Transactions, this paragraph should identify both “loss of local” and “loss of LD” transactions.

In Section II.B., Ordering – Available Interfaces, the table summarizing EDI transaction usage should be modified to included unsolicited 865 transactions. A list of unsolicited 865 transactions, as identified by Ameritech at the November CLEC forum in Chicago, is attached hereto as Appendix B.

Regarding Section II.B., Ordering Message Flows, currently , for Ameritech Illinois, the 860 transaction allows a CLEC to submit a change (supplement) to an original purchase order by providing the "changed information" only, *or* by providing a full refresh of the original purchase order by indicating which details have *not* changed. This is documented in the Ameritech ESOG on TCNET for transaction 860 Purchase Order Change Request. CoreComm request that the capability of doing a Change using either a method of "full refresh" or "changes only" is supported in the improved OSS.

Also in this section, the first sentence of the fifth paragraph should be changed to state that “In Ameritech Illinois an UNSOLICITED 865 transaction is **. . .**.” In addition, unsolicited 865 transactions should be identified in detail in the Plan of Record.

In Section II.C., Provisioning – Jeopardy Notification, the PMO should reference the use of the unsolicited 865 for certain jeopardy situations. The PMO should indicate that the use of the UNSOLICITED 865 transaction is used for situations that are, in reality, jeopardies. Ameritech is sending the unsolicited 865 when an engineer identifies that there are no facilities for the pending order prior to the due date. The engineer changes the due date with this transaction. Since it is a facility delay, this should be an 870. In addition, the nature of the transaction being unsolicited is one problem in that the

CLEC community cannot provide proper customer service due to due date changes or telephone number changes. The other concern relates to the performance levels not being met. An example of this concern is where a due date or phone number change causes the order to be re-worked and further delays the customer expected service date. This re-starts the clock on the performance measurement for the transaction.

In Section II.D., Maintenance and Repair, It appears that MLT testing is only available for a loop/port combination. It is unclear why a loop cannot have MLT testing in the absence of a port.

In Section II. E., Billing – Exchange Message Interface, the Plan of Record identifies changes that will be needed to billing OSS. However, billing OSS has been excluded from the uniform 13-state CMP collaborative process. Billing OSS needs to be either included in the 13 state CMP, or identified as a separate billing OSS forum. It must be specifically stated *somewhere*. As things currently stand, it is addressed nowhere.

In Section III.A., Pre-Ordering, SBC/Ameritech should clarify whether CORBA will be available as an alternative to EDI, or whether CORBA will be made mandatory.

In Section III.A., Address Verification, the WTN function is listed to be available for residential services only. The address validation for WTN in business services should be on-line. The existing data file is not a complete validation of the address. CoreComm requests that a business WTN address validation be included on the FMO. This feature is necessary for the provisioning of business services as well as residential services; SBC/Ameritech should commit to provide this feature for business services in addition to residential services.

In Section III.A., Digital Subscriber Loop Pre-qualification Inquiry, as well as Digital Subscriber Loop Qualification Inquiry are completely inadequate. In both Ohio and Illinois the CLECs have been very specific on their requirements for the pre-qualification of loops, and thus far SBC/Ameritech has been unresponsive. At a minimum, SBC/Ameritech should provide the number of DSL capable loops in a service area . This is a major problem for CLECs, and a major shortcoming of the Plan of Record.

Concerning Section III.A., Preordering – Dispatch Inquiry, since the PMO handles only the residential accounts, the Plan of Record should be clarified to indicate whether the FMO, available in March 2001 be expanded to handle the business services? CoreComm requests that when this functionality is available in the Ameritech region, it includes dispatch inquiry for business service.

In Section III.B., Ordering, there is no information concerning a proposed schedule for implementation. CoreComm is concerned about the EDI Message flow changes and whether or not adequate time will be provided to review and make requests of SBC based on their POR filing to the FCC. A dramatic change in the EDI message flow would require a significant amount of time an effort on the part of CLECs to keep their ordering programs compatible with the changed EDI message flow.

Also, it is expected that the Electronic Message Flow in the FMO includes the 855 Purchase Order Advise, or comparable transaction, to facilitate a firm order confirmation of loop orders where more than 50 loops are requested. SBC/Ameritech should clarify this point in the Plan of Record.

Regarding Section III.C., Provisioning – Posted Order Status, SBC/Ameritech should provide this function. Particularly with the poor quality of order processing being experience by CLEC in the Ameritech region, this feature would help CLECs greatly. Currently Ameritech does not perform a quality check between what was ordered and what was delivered. This creates a problem with Ameritech's billing to CoreComm plus a provisioning problem on future MACs. Currently, CoreComm must pull every CSR post-install and compare it to the EDI order for a match. While Ameritech should perform a quality check on service orders, the Post Order status function would help CLECs track the accuracy of order completion.

In Section III.D., Maintenance and Repair, MLT should be available for a loop without port. Also, SBC/Ameritech indicates that the Maintenance and Repair GUI Activity Duration window will be enhanced to show billing for dispatch. CoreComm is concerned that this may exacerbate the current problem of bill reconciliation for billable hours incurred for dispatches made in error. CoreComm requests that the FMO include the ability to contest these charges from the MLT GUI**.**

In Section III.E., Billing – Bill Data Tape, the need for billing to be treated in the Change Management Process, or separate forum is once again highlighted . SBC/Ameritech is identifying the possibility of changes to billing OSS in this Plan of Record, but the change management process for those changes are not being addressed anywhere. SBC/Ameritech should affirmatively identify where that change management process will be addressed.

Respectfully Submitted,

CORECOMM ILLINOIS, INC.

By:_____

Thomas J. O'Brien
CoreComm Illinois, Inc.
450 West Wilson Bridge Rd.
Worthington, Ohio 43085
(614)430-5101

CERTIFICATE OF SERVICE

The undersigned attorney for CoreComm Illinois, Inc., hereby certifies that he caused copies of the attached Comments of CoreComm Illinois, Inc., to be served on each of the parties on the attached service list by depositing such copies in the U.S. Mail, First Class Postage Prepaid on January 21, 2000.

_____
Thomas J. O'Brien

Attorney for
CORECOMM ILLINOIS, INC.

Ameritech Identified Changes	
Issue	**Planned Implementation Timeframe**
1. ARIS Transaction Enhancements	
Conversion from batch to transactional updates	1Q, 2000
For ARIS / EXACT application to application ordering.	
This affects response time on FOC's for	
Loops, LNP and other Unbundled products that are	
Currently ordered via EDI.	
2. ISDN Direct and Centrex EDI Improvements	1Q, 2000
Update of application to application ordering for ISDN	
Direct and Centrex to move purchase orders toward	
Standards Compliance.	
This is for ISDN resale only.	
3. EDI Enhancements	2Q, 2000
Addition of Secondary Class of Service information to	
EDI transactions to provide greater flexibility in application	
To application ordering.	
Allows the EDI ordering of	
Resale Centrex to be more accurate.	
4. CPO Flow Through Enhancements	2Q, 2000
Enables flow through of Combined Platform Offering Loop	
Orders for business accounts. UNE -P for business	
Available in Illinois 12/25.	
Need to address with CoreComm Marketing.	
5. Flow Through Initiative	2Q, 2000
Improvements to internal order processing flow through	
Including automatic product recognition and routing, logging,	
Order generation and acknowledgement	
Affects Resale POTs timing of FOCs and eliminates rejects in	
error.	
6. Uniform Interface	2Q, 2000
Enhancements to Pre-Ordering transactions for application	
To application ordering. Allows Loop Pre-Qualification.	
CFA, NC/NCI codes, CLLI, service availability.	
CLEC Community was Prenotified on 12/16/99.	
Details will be provided 1/14/2000.	

7. LEC Protection	2Q, 2000
Addition of ordering information to add LEC protection	
For all states. This is mandated in Michigan but SBC /	
Ameritech has decided to implement across the states.	
Affect - When trying to assume a customer that has a CSR	
With LEC Protection turned on we will receive a REJECT	
Unless we have proved an LOA exists between the Customer	
And CoreComm. EDI impacts. This was a "heads up" from	
Ameritech. The CLEC community was told to speak with their	
Account management if they felt this to be unacceptable.	
8. ADSL Shared Line Arrangement	2 - 3 Q 2000
Add application to application ordering for release of ADSL on	
POTS service.	
EDI impact.	
9. ADSL Flow Through	2 - 3Q 2000
Changes to internal processing to provide flow through	
Of ADSL Shared Line Arrangement activity.	
10. Release Update	3Q, 2000
Update to application to application ordering procedures	
To address new ASR 22 of ARIS/EXACT ASR release	
Changes.	
11. LSOG4	3Q, 2000
Update to current EDI ordering procedures to further align	
With LSOG4 standard. Affects all Unbundled and Resale	
Affects all Unbundled and Resale EDI Pre-Ordering and Ordering.	

Attachment B-6

Rhythm Reply to SBC/Ameritech Illinois Plan of Record

RHYTHMS' COMMENTS ON THE
AMERITECH ILLINOIS OSS PLAN OF RECORD

Rhythms Links, Inc. ("Rhythms") has reviewed SBC/Ameritech's Plan of Record for Illinois ("Illinois POR"), submitted pursuant to the conditions to the Illinois Commerce Commission's approval of the SBC/Ameritech merger. In the Illinois POR, SBC/Ameritech identifies OSS process and interface modifications planned for Illinois. The following comments address Rhythms' concerns with the Illinois POR and suggest improvements to the OSS modifications planned by SBC/Ameritech in Illinois.

The Illinois POR incorporates by reference portions of the SBC/Ameritech OSS Plan of Record for Pre-Ordering and Ordering of xDSL and other Advanced Services (xDSL POR). The xDSL POR was submitted to the Federal Communications Commission ("FCC") pursuant to the FCC Conditions of the SBC/Ameritech Merger. In its comments on the xDSL POR, Rhythms identified a number of serious deficiencies in the descriptions of OSS changes sketched out in the xDSL POR. In addition, Rhythms-identified areas in which, given the insufficient level of detail, it was not possible to - respond concerning the adequacy of the OSS changes proposed. Finally, Rhythms
addressed issues which should have been included in the POR, but on which the POR is entirely silent. To ensure a comprehensive record, Rhythms has attached a copy of its comments to the FCC as Attachment A.

As noted in the comments on the xDSL POR, Rhythms believes SBC should unify its existing disparate legacy OSS into a region-wide set of systems which will support the same capabilities and features in all thirteen SBC states. Additionally, this must be done in parity with SBC's retail xDSL operations and/or the operations of its advanced services affiliate. In upgrading and unifying its existing systems to accomplish this goal, SBC should employ a "best of breed" approach. In other words, if SBC has the capability to offer a feature or functionality in any one state, it should commit to offer that capability throughout its 13-state region as quickly as possible. Thus, SBC should not employ a "least common denominator" approach, nor should it offer features or functionalities on a "where available" basis.

A primary example of the application of these principles is presented by the results of the Rhythms/SWBT arbitration before the Texas Public Utilities Commission. As SBC is aware, the Arbitrators in that proceeding had the benefit of an extremely extensive evidentiary record that they relied upon to reach a detailed decision on OSS requirements consistent with the requirements of the Telecommunications Act of 1996. SBC will be required to comply with this arbitration award in Texas. Because SBC intends to deploy a 13-state-wide strategy for its OSS, it should provide, at a minimum, the same OSS capabilities throughout the entire territory (including Illinois) that it is required to provide in Texas.

POR Future Method of Operation Section A (Pre-Ordering)

SBC/Ameritech proposes to add new functions to the current EDI interface that were previously provided by Ameritech Illinois only through Data Validation. According to the Illinois POR, those functions will be available in Illinois in April 2000. However, the Illinois POR does not identify the functions that it proposes to make available. Therefore, it is impossible for Rhythms to provide meaningful comment on this issue.

SBC/Ameritech also proposes to introduce a new version of the current EDI application-to-application interface, as well as a pre-ordering Graphical User Interface ("GUI"), both of which would include Digital Subscriber Loop Qualification Inquiry functionality. In describing that functionality, the Illinois POR suggests that it is described more completely in the xDSL POR. However, as Rhythms noted in its comments to the FCC, the xDSL POR provides so little detail concerning the actual operational and technical details that it is impossible to determine precisely how such functionality will be offered. For example, Rhythms requested, and the Texas PUC and the FCC ordered, that SBC provide CLECs with access to all OSS, including those available to internal SBC personnel. Rhythms' Comments to SBC/Ameritech Merger Conditions, OSS Plan of Record for Pre-ordering and Ordering of xDSL and Other Advanced Services at 2. Such systems include SBC's primary loop assignment and tracking tool, LFACS.

In a decision released just last week, the Wisconsin Public Service Commission specifically addressed the inadequacies of Ameritech's loop ordering systems in that state.[26] The PSC stated, "[c]onfidential information cited in the briefs of the intervenors and the staff further support the Commission's finding here that the operational support systems, both pre-ordering and ordering, for handling requests for unbundled loops, including xDSL compatible loops, are inadequate as a matter of law as well as fact." AADS Wisconsin Final Decision and Certificate at 22. To insure non-discriminatory treatment of CLECs, it is essential that SBC/Ameritech's loop ordering and pre-ordering procedures be immediately corrected. In the AADS Wisconsin Final Decision and Certificate the Commission stated: "Given AW's current system for satisfying xDSL loop orders and the extensive need for manual intervention to provision xDSL loops, the Commission has serious concerns as to whether AW will provide xDSL loops on a nondiscriminatory basis. AW's lack of an effective loop prequalification operational support system or preorder process for xDSL loops, directly and negatively impacts on competitor's ability to fulfill customer orders." Id at 9-10.

[26] Petition of Ameritech Advanced Data Services of Wisconsin, Inc. for Authorization to Resell Frame Delay Switched Multimegabit Data, and Asynchronous Transfer Mode Services on an Intrastate Basis and to Operate as an Alternative Telecommunications Utility in Wisconsin. 7825-TI-100; Investigation into the Digital Services and Facilities of Wisconsin Bell, Inc. (d/b/a Ameritech Wisconsin) 6720-TI-154, January 13, 2000.

The Wisconsin Commission rightly noted that Ameritech Wisconsin's ordering and pre-ordering procedures could easily lead to discriminatory treatment of CLECs.[27] It is for this reason that Rhythms is concerned regarding access to SBC/Ameritech information. In fact, the xDSL POR never mentions LFACS "by name," or provides a sufficient description to determine whether CLECs will be given access to LFACS, or instead to an alternate database containing some or all of the information contained in LFACS. As a result, Rhythms cannot determine whether the functionalities pointed to in the xDSL POR and Illinois POR will meet Rhythms' needs or the requirements of parity. Therefore, Rhythms requests that SBC/Ameritech provide detailed information regarding the proposed Digital Subscriber Loop Qualification Inquiry functionality, including the exact databases or other sources of loop makeup information that will be made available to CLECs.

Finally, in Attachment A, Rhythms provides further detailed responses regarding the information that will be provided in the Digital Subscriber Loop Qualification Inquiry functionality, as described in the xDSL POR.

POR Future Method of Operation Section C (Ordering)

The Illinois POR states that SBC/Ameritech plans some modification of data field usage for ordering of xDSL-capable unbundled loops. However, the Illinois POR is devoid of any detail concerning exact changes SBC/Ameritech proposes for standardizing these fields. SBC/Ameritech should immediately inform the Commission and all CLECs what information is to be made available and how such changes will alter SBC/Ameritech's processes and procedures.

The Illinois POR notes SBC/Ameritech's proposal to use the Service or Product Enhancement Code ("SPEC") field on the LSR to request conditioning. However, the Illinois POR (as well as the xDSL POR) provides insufficient detail to judge whether the proposal has any merit. The Illinois POR also states that SBC/Ameritech will require the LSR Type of Service (TOS) field to indicate whether a loop is for residence or business service. Absent any explanation and justification, Rhythms opposes this needless disclosure of sensitive business information to SBC as part of the ordering process.
Such disclosure of information, given the current potential for discrimination, hinders CLEC chances to receive reliable incumbent service inputs. Again, the Wisconsin PSC decision in the AADS case is on point. The PSC noted: "This record supports the conclusion that tariff pricing [*for xDSL and other services*] is reasonable and necessary to prevent injury to competition by the potential discrimination inherent in pre-ordering and ordering OSS that are excessively reliant upon subjective, human intervention and that lack strong controls." Id. at 25 (italicized language added).

[27] This PSC decision addresses the record evidence in the Wisconsin case. However, because SBC/ Ameritech proposes to roll out a unified 13 state OSS process, the AADS record is extremely important as a current assessment of the inadequacies of the utility's system operations.

The Illinois POR states that SBC/Ameritech's OSS will validate "that an available loop can support the requested Power-Spectrum Density (PSD) class before confirming a received order." Illinois POR at 29. Rhythms and other CLECs do not want or need SBC/Ameritech to attempt to perform this task. Moreover, this proposal appears to indicate that SBC still intends to maintain and/or extend some version of its selective feeder separation/binder group management program currently deployed in several states. Both the Texas PUC and the FCC found the program to be illegal, and required that the program be dismantled immediately. Therefore, the Illinois POR should verify that, with the exception of AMI T1s, SBC/Ameritech has dismantled all binder group management or spectrum management programs.

Line Sharing

The Illinois POR is completely silent with respect to SBC/Ameitech's plans to modify its OSS to comply with the FCC's line sharing order. Rhythms, as well as other CLECs, are eager to have SBC/Ameritech provide an efficient, mechanized OSS capability to support line sharing. Therefore, SBC/Ameritech should amend its POR immediately to incorporate OSS changes required to support line sharing.

Attachment C-1